

August 31, 2015

National Credit Union Administration  
1775 Duke St.  
Board Secretary  
Alexandria, VA 22314

RE: Comments on Proposed Rulemaking for Part 723; RIN 3133-AE37

Dear Gerard Poliquin,

I am writing on behalf of Wasatch Peaks Federal Credit Union, which serves Weber, Davis and Morgan Counties, a tri-county area in the State of Utah. We have just over 30,500 members and are just under \$277,000,000 in Asset Size. Wasatch Peaks appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

A principle-based rule is a more modernized outlook on the regulation, and would allow for Wasatch Peaks to be more competitive in the current environment. More flexibility will give us better opportunities to assist the local businesses in our community with offering financing alternatives from the large commercial banks we have surrounding us. One of the goals of a credit union, and more specifically, a credit union's member business loan program, is to assist the local community owned businesses with services that help these businesses which are integral to our nation's well-being. This new modernized proposal would really help us achieve this. As Credit Unions move into business owner communities as a viable and worthwhile option, it will be very helpful for us and our members to have more competitive options.

We also support the adjustments in the MBL calculation. Unfortunately, the statutory lending cap remains in place, but we support NCUA removing the 12.25 percent shorthand calculation as it is not required by the Federal Credit Union Act (FCU Act) and only an added complication to the rule. The proposed calculation meets the FCU Act's requirements while removing an unnecessary provision.

Furthermore, the current member business rule has many requirements that necessitate obtaining a waiver, even though they are not mandated by statute. This adds unnecessary burden to credit unions making commercial loans. The proposed rule would remove all of the requirements necessitating waivers and thus eliminate the need for waivers. This represents a major regulatory improvement that we fully support.

As a whole, we support and appreciate the NCUA's efforts to modernize the Member Business Lending rules. Thank you for the opportunity to comment on these proposed changes, and for further consideration of our views.

Sincerely,

Blaine Goodell  
EVP / COO  
Wasatch Peaks CU

cc: CUNA, CCUL

