

Submitter Info.txt

Please Do Not Reply To This Email.

Public Comments on Member Business Loans; Commercial Lending: =====

Title: Member Business Loans; Commercial Lending

FR Document Number: 2015-15466

RIN: 3133-AE37

Publish Date: 7/1/2015 12:00:00 AM

Submitter Info:

First Name: Jim

Last Name: Morell

ZIP/Postal Code: null

Email Address: null

Organization Name: Peninsula Community Federal Credit Union

Comment: I am writing on behalf of Peninsula Community Federal Credit Union (PCFCU) which serves the five counties on the Olympic Peninsula in Washington State. We have nearly 18,000 members and \$160 million in assets.

PCFCU does not currently offer MBLs, but our long term strategic plan does target this as an objective. There are many small entrepreneurs and other small business activity that does not have adequate access to small business loans from other institutions in order to run their business.

We commend the NCUA Board on the following proposed changes:

Allowing a 1-4 family residence to not be considered a MBL.

Allowing a vehicle loan to a small business owner to be a personal loan.

Allowing purchased business participations to not be counted as MBLs. Note that this change is not only important to individual CUs but to the entire industry as some CUs reach the statutory cap they can still serve member needs by selling/purchasing such loans.

We also would like to see the standards proposed by NCUA to determine the consistency between new rules and your application of risk tolerances and management risk mitigation practices. These should go hand-in-hand.

We believe that making these changes will allow PCFCU serve more members and our communities.

Again, thank you for the opportunity to comment on the Proposed Rule and for considering our views on the proposed MBL rule.

I am writing on behalf of Peninsula Community Federal Credit Union (PCFCU) which serves the five counties on the Olympic Peninsula in Washington State. We have nearly 18,000 members and \$160 million in assets.

PCFCU does not currently offer MBLs, but our long term strategic plan does target this as an objective. There are many small entrepreneurs and other small business activity that does not have adequate access to small business loans from other institutions in order to run their business.

We commend the NCUA Board on the following proposed changes:

Allowing a 1-4 family residence to not be considered a MBL.

Allowing a vehicle loan to a small business owner to be a personal loan.

Allowing purchased business participations to not be counted as MBLs. Note that this change is not only important to individual CUs but to the entire industry as some CUs reach the statutory cap they can still serve member needs by selling/purchasing such loans.

We also would like to see the standards proposed by NCUA to determine the

Submitter Info.txt

consistency between new rules and your application of risk tolerances and management risk mitigation practices. These should go hand-in-hand. We believe that making these changes will allow PCFCU serve more members and our communities.

Again, thank you for the opportunity to comment on the Proposed Rule and for considering our views on the proposed MBL rule.