



08/25/2015

NCUA Board
1775 Duke Street
Alexandria, VA 22314

Re: Comment Letter on the Proposed Amendments to NCUA's MBL Rule

To Whom It May Concern:

Keystone United Methodist FCU is pleased to comment on NCUA's Notice of Proposed Rulemaking for 12 CFR Part 723 regarding potential changes to the Member Business Loan regulations. We commend the Board on considering these changes to assist credit unions and to provide the regulatory relief we need.

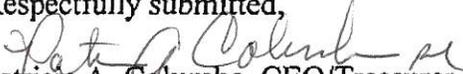
We serve the United Methodist Churches in Western PA, as the other United Methodist Credit Unions around our country serve the Churches in their respectable Conferences. We hear time and time again, from our Churches, that the banks simply do not take the time to help them with their loans, and do not understand Church financials. We have helped many churches but we are on the verge of being stopped, because of NCUA regulations. Any relief, whatsoever, will help us, and will help us help each other.

Your proposal on member business lending is a breath of fresh air. It's really unlike anything we see coming out of Washington these days. You are proposing to actually reduce that burden to spur lending. This proposed amendment loosens the regulation and gives credit unions the chance to do what we do best - serve our members.

I believe the NCUA is right on track with the MBL proposal. I must add, though, that more consideration could be given to the church lending, which currently is considered MBLs. I feel that more could be done in terms of redefining a church loan or any loan made to a non-profit institution. I'm of the opinion that Part 723 does not necessarily include a church loan or any loan made to non-profits as either a business loan or a commercial loan. Even when we look at the new proposed definitions, I still believe there is room to exclude church loans or loans made to non-profits.

I urge your legal counsel to take another look at these definitions and see if the possibility exists to exclude such lending from the proposed new definitions and interpretations, and to hopefully provide more clarity as to whether or not a church loan should continue to be accounted for and defined as an MBL for regulatory cap purposes.

Respectfully submitted,


Patricia A. Columbe, CEO/Treasurer