



**Headquarters**  
PO Box 60651  
Montclair, CA 91763-1126  
(800) 245-0433  
Fax: (909) 981-7055

Mr. Gerard Poliquin  
Secretary to the NCUA Board  
1775 Duke Street  
Alexandria, VA 22314

AUG31'15 AM11:34 BOARD

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

Dear Mr. Poliquin:

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.

Regulatory burden is really hurting our credit unions. There have been so many changes in the last few years that have made it more difficult for credit unions to lend and to serve its members. That is why 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. It's a novel idea that I think will work. The proposal the NCUA is considering turns the tide. It gets Washington out of the way 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 our credit union is mostly involved in, 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,

Ramon Noperi  
President & CEO

**Desert Southwest**  
(602) 277-5325

**New England**  
(866) 303-6386

**Missouri**  
(816) 245-4883

**Cal Nevada**  
(916) 374-1583