

August 31, 2015

National Credit Union Administration  
Gerald Poliquin, Secretary of the Board  
1775 Duke Street  
Alexandria, VA 22314-3428

Re: Comments on Proposed Rulemaking for Part 723; RIN 3133–AE37 regarding the Member Business Lending Proposal

Dear Mr. Poliquin,

We are the Board of Directors of SAFE Credit Union (SAFE) located in Folsom, California.

We thank you for the opportunity to provide comments on the proposed amendments to the Member Business Lending regulation. SAFE serves members in Sacramento County and the surrounding eleven contiguous Counties. We serve over 186,000 members and have assets of \$2.3 billion. Recently, SAFE Credit Union was named the 2015 SBA Lender of the Year for the Sacramento, CA SBA District Office serving Northern California.

The proposed amendments will ease the process of making business loans to our members, and thereby expand credit to local small businesses. In many cases we are the member's best hope for a loan to continue operations or expand their business. These are creditworthy borrowers but due to the small size of these loans, some banks do not want to bother with them. In addition, the recourse requirements (guarantors) related to credit unions makes it hard to compete with banks on well qualified borrowers, and the business lending cap creates concern when expanding costly infrastructure in support of business lending activities. We do recognize that with these changes comes increased responsibility, and we are committed to continue to develop and maintain a safe and sound business lending program. As the Board of Directors of SAFE we welcome this challenge.

SAFE's Board of Directors supports all of the proposed changes. These changes will provide SAFE with the opportunity to better compete in its marketplace, better meet the needs of its small business members, and improve the communities it serves.

Thank you again for the opportunity to comment on the proposed amendments.

Respectfully,

Ron Seaman  
Chairman of the Board

CC: CUNA, CCUL