



Monday, August 31, 2015

Sent via Email: regcomments@ncua.gov

Gerard S. Poliquin, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria Virginia 22414-3428

RE: Comments on Proposed Rulemaking
for Part 723, RIN 3133-AE37 Member Business Loans

Dear Mr. Poliquin:

I am writing in support of the proposed Rulemaking for Part 723, Member Business Loans (MBLs) on behalf of the 12,567 members of the Texoma Community Credit Union (TCCU) in Wichita Falls, Texas. TCCU commends the NCUA for easing the government overreach on MBLs.

TCCU had successfully made MBLs from the mid-1990s through about 2008, when the NCUA effectively shut down all MBL activity regardless of the success of the program. To date, TCCU still has not taken a single penny of loss on MBLs. It is clear our members respect and enjoy the opportunity to obtain business loans that banks will not offer. It is abundantly obvious that the Management and Staff of TCCU know how to underwrite and manage MBLs.

Recently the TCCU Board of Directors directed Management to again offer MBLs. As we re-engage in MBL underwriting we have hired a former Business Lending Banker to assist in underwriting. Further, instead of TCCU doing all of the underwriting internally, as we successfully did for over a decade, we now engage the help of Credit Union Business Group (CUBG), a CUSO which specializes in MBL work. CUBG's underwriting is exceptional and has earned high respect from NCUA. In summary, TCCU is quite competent to comment on MBLs.

TCCU is well positioned to again engage in MBL, and it is competent to dialogue about the proposed Rulemaking for Part 723, Member Business Loans. Our team has reviewed the proposed new rules and **generally TCCU supports all aspects of the Rule.**

TCCU is amazed at the banker letters attacking credit unions for serving the very people they deny loans to. It is intriguing that bankers tell their customers "No you can't have that loan" and turn around to write a letter to the NCUA complaining that a credit union said, "Yes, you may have the loan we denied." Members who are told "No" by bankers become raving fans of credit unions and they protect the blessing the credit union granted them. They pay their loans on time because they cherish what their credit union has done to make their dreams come to life. Bankers should put their nose back into their own business and Leave Credit Unions Alone.

Specifically, TCCU supports removing NCUA waivers. The proposed Rulemaking places the responsibility and authority back on the Credit Union, where it appropriately belongs. In the proposed Rules the NCUA has stopped micro-managing and eased its "Government Overreach" such that there should be little if any need for NCUA waivers.

TCCU is comfortable with an examiner scrutinizing our commercial loan portfolio and policies just so long as they do not micro-manage the process. An individual who has about 4 days of knowledge about our commercial loan process, one who spends an exceedingly small amount of time really understanding my specific commercial loan process should not attempt to tell a team of greatly successful executive managers that their system is wrong, broken and the Examiner has found (or created) an Examiner's Finding. Examiners taking insignificant Findings and making them into exaggerated time-wasted discussions must stop. (I have many real stories about Examiner Government Overreach and the waste they create. Ask me.)

This new rule will benefit TCCU to allow us to create, develop, grow and manage a commercial loan program without excessive Government Overreach. We will be able to classify loans that will not force us to stop lending when we reach the politically established 12.25% CAP.

That 12.25% CAP was not set based upon any concept of safety and soundness. It was set to appease bankers during the CUMMA War of 1998. The HR 1151 political war was about credit union member access; not about member business lending. Further, the banker's 1998 pontificating that allowing credit unions to make business loans would result in "taxpayer losses to the NCUA" never proved true. Bankers wrong again!

Finally, the new NCUA proposed rule will allow credit unions to write logical MBL policies; the new rule delegates back to the Board the authority it rightly deserves.

Trusting the NCUA will act in the best interest of credit unions, I am,

Yours sincerely,



L. Wayne Mansur
President & CEO