

August 09, 2018

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

RE: Comments on Proposed Rule 701, Loans to Members and Lines of Credit to Members

Dear Mr. Gerald Poliquin,

Introductory paragraph:

I am writing on behalf of Power Coop Employees Credit Union. We have 2000 members and \$34M in assets. Power Coop Employees Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule for Loans to Members and Lines of Credit to Members.

Letter Body:

Should the NCUA provide longer maturity limits for 1-4 family real estate loans (currently 40 years; § 701.21(g)(1))?

If so, what maturity limits do you recommend for such loans, and why?

If not, why not?

Should the case-by-case Board exemption for maturity limits on 1-4 family real estate loans be retained?

If so, under what circumstances would such exemptions be appropriate?

If not, why not?

Should the NCUA provide longer maturity limits for other loans, such as certain home improvement, mobile home, and second mortgage loans (currently 20 years; § 701.21(f))?

If so, what maturity limits do you recommend for such loans, and why?

If not, why not?

Should the NCUA provide a single universal standard limit for commercial loans and loan participations that may be purchased with respect to a single borrower or group of associated borrowers?

If so, what limit do you recommend for such a standard, and why?

If not, why not?

Do you support the proposed method of identifying all of the various loan maturity limits in one section of the regulations and including cross-citations? Why, or why not?

Three limits exist for loans to a single borrower or group of associated borrowers under the general limits, loan participations, and commercial loans. Do you support the proposed method of identifying each limit in the general limit section and including cross-citations to the more specific loan participation and commercial loan limits? Why, or why not?

Summary of your position:

Vice President/Manager

Closing paragraph:

Thank you for the opportunity to comment on this Proposed Rule and for considering our views on NCUA's Loans to Members and Lines of Credit to Members rule.

Sincerely,

Vicki Holden
Manager
Power Co-Op ECU

cc: CCUL