

August 27, 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,

I am writing on behalf of Travis Credit Union, which serves a twelve county field of membership in Northern California. We have 156,000 members and \$3 billion in assets. Travis 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.

Regarding the NCUA providing longer maturity limits for 1-4 family real estate loans, Travis Credit Union feels that the current market is sufficiently supported with the maximum maturity limits established today. Most borrowers refinance their homes several times for cash out opportunities, therefore the need is not there to adjust the maturity.

Regarding the case-by-case Board exemption for maturity limits on 1-4 family real estate loans, Travis Credit Union does not feel that the situation would arise to require such an exemption.

Regarding the NCUA providing longer maturity limits for other loans, such as certain home improvement, mobile home, and second mortgage loans, Travis Credit Union does not feel that the situation would arise to require such an exemption.

Regarding the NCUA providing 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, Travis Credit Union does not support such a standard. The new policy provides adoption based upon the individual credit union and their strategy for growth. All credit unions should be considered individually as we all do not fit into a nice, neat box.

Travis Credit Union supports the proposed method of identifying all of the various loan maturity limits in one section of the regulations and including cross-citations. There has been confusion regarding the various requirements with maturity limits.

Travis Credit Union supports 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. Travis Credit Union has experienced confusion with the current layout.

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,

Stacy Fifield
Senior Vice President and Chief Lending Officer
Travis CU

cc: CCUL

