

October 02, 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 Essex County Teachers Federal Credit Union, which serves educational employees in Essex County, New Jersey. We have 2600 members and \$13 million in assets. I appreciate 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.

I believe that the current maturity limits for 1-4 family real estate loans is sufficient and no change is warranted. I also believe the current exception process is appropriate for extraordinary situations related to individual loans.

I believe current limits are appropriate for certain home improvement, mobile home, and second mortgage loans. Since home improvement and second mortgage loans are typically not purchase contracts, the borrower can adjust his plans to what he can afford with a 20-year term. As for mobile homes, they tend to depreciate rather than appreciate. I believe a maturity longer than 20 years for a mobile home loan poses excessive risk.

I believe NCUA should provide a single universal standard limit for commercial loans and participations that may be purchased with respect to a single borrower or group of associated borrowers. That limit should be tied to the capital a credit union has to allow better capitalized credit unions greater latitude and lesser capitalized credit unions less latitude.

I support identifying all of the various loan maturity limits in one single section of the regulation.

I support the proposed method of identifying all of the various loan maturity limits in one section of the regulations and including cross-citations. This update will simplify compliance. I also 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 for the same reason.

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,

Robert Steeves  
CEO  
Essex County Teachers FCU

cc: CCUL