Gerard S. Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

Sent electronically to: regcomments@ncua.gov
Re: RIN 3133-AE88

October 2, 2018

Dear Mr. Poliquin:

On behalf of the credit unions in the state of Nebraska, I appreciate the opportunity to comment on the National Credit Union Administration's (NCUA) proposal regarding Loans to Members and Lines of Credit to Members. The Nebraska Credit Union League (NCUL) is the non-profit trade association that represents the interests of Nebraska credit unions and their members. The state of Nebraska has 50 federal credit unions (FCUs) that would be impacted by this rule, along with their thousands of members.

NCUL commends the NCUA for its attempt to reduce regulatory burden and to improve clarity in its regulation of FCUs. While NCUL supports a single universal standard limit for loans to a single borrower or group of associated borrowers, we would like to see it above the current limit of 15 percent. Nebraska credit unions are generally well-capitalized and are operating in a safe and sound manner to benefit consumers and the community. As such, we believe that loans originated by our credit unions should have a higher limit.

Credit unions are embedded in their communities and have a deeper relationship with their members as well as a greater knowledge of these loans and should be allowed to set their own limits based on safety and soundness. We believe a waiver should be allowed for those loans originated by the credit union, similar to the waivers offered for loan participations. This would allow Nebraska FCUs to apply to increase the limit on an individual borrower, if they have a proven track record of strong lending practices and expertise. NCUL would support an application for such a waiver up to 25 percent of the credit union's capital, if the FCU can meet criteria set by the NCUA.

NCUL encourages the NCUA to increase the maturity limits for 1-4 family real estate loans and other loans. Removing the case-by-case exception and allowing longer maturity terms would benefit consumers in Nebraska by removing the uncertainty of the availability of the loan product and shortening the application process. Credit unions are able to properly account for the underwriting considerations of a longer-term loan and members would benefit from the additional credit product terms to better fit their individual needs.

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We greatly appreciate the opportunity to comment on this proposal, as well as the NCUA's recognition of the impact that increased regulatory burden can have on credit unions and their members. NCUL believes these changes could make a significant, positive impact on our FCU members and their communities, and asks that the NCUA consider our suggestions when drafting its final rule.

Sincerely,

J. Scott Sullivan

J. Scott Sullivan
President/CEO
Nebraska Credit Union League

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