



VIA E-MAIL: regcomments@ncua.gov

June 16, 2005

Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

Re: 12 CFR Part 723 – Member Business Loans

Dear Ms. Rupp:

The Association of Corporate Credit Unions (“ACCU”) would like to thank you for the opportunity to comment on the proposed revisions to National Credit Union Administration’s (NCUA) Part 723 (MBL Rule). ACCU is the primary trade association for the Nation’s 30 corporate credit unions.

NCUA has proposed three changes to Part 723, namely clarifying the minimum capital requirements for a federally insured corporate credit union, revising the definition of “construction and development loan” and revising the definition of “net worth.” In general, ACCU supports the proposed changes. ACCU would like to provide some specific comments below.

A. Corporate Credit Union Capital Requirements

NCUA proposes to revise §723.7(c)(1) to make the distinction between the capital requirements for natural person credit unions and for corporate credit unions. The NCUA proposes to do so by referencing §702.102(a)(1) when identifying minimum capital requirements for natural person credit unions and §704.3(d) & (e) when identifying the required minimum capital ratio for corporate credit unions. ACCU supports this proposed change, as it makes clear the capital requirements for these two different types of credit unions.

ACCU thanks the NCUA for the opportunity to share its views on the proposed revisions. If you have any questions regarding our comments, please do not hesitate to contact me at 202-508-6731.

Very truly yours,

Michael F. Canning, Esq.