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Snyder, Diane L

From: Beverley Rutherford [beverley.rutherford@vacu.org]  
Sent: Monday, June 20, 2005 4:13 PM  
To: \_Regulatory Comments  
Subject: Part 723-Member Business Loans

We appreciate the opportunity to comment on the proposed amendments to NCUA's Member Business Loan rule. I am responding on behalf of a 1.2 billion state-chartered credit union in Virginia. We support NCUA's proposed changes to clarify the minimum capital requirements a federally insured corporate credit union must meet to make unsecured loans to its members and also the proposed amended definition of construction or development loan. We also agree with making the definition of net worth to be consistent with the definition of net worth as found in the Federal Credit Union Act and NCUA's PCA regulation. Thank you again for the opportunity to comment on this proposal.

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