



JUL 30 '08 PM 12:47

6

July 25, 2008

NCUA
Mary Rupp, Secretary of the Board
1775 Duke Street
Alexandria, Virginia 22314-3428

RE: Member Business Loan Rules

Dear Board of Directors;

TFECU has been doing member business loans and participation loans for the past 8 or 9 years. We feel that the participation loan are an avenue to invest funds with a higher rate of return than an investment at the Corporate. Our loan portfolio is limited due to the maximum amount of member business loans being 12.25% of assets.

I want to encourage the NCUA Board to increase the member business loan limits from 12.25% to 20%. If the Board is against a blanket increase for all credit unions, maybe additional criteria is needed to be tied to the percentage based on capital or other key ratios for a waiver to be granted. The waiver process needs to be a streamline process, and user friendly.

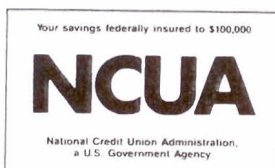
In this economy, TFECU is not in favor of lower the standards for member business loan, like lowering the loan-to-value for borrowers seeking construction and development loans, or collateral and security requirements.

Thank you for the opportunity to comment on the member business loan proposal.

Sincerely,


Phillip L. Hart
President

PH/mr



9323 East 21st Street – Tulsa, OK 74129-1400 – (918) 610-0200
401 East 4th – Tulsa, OK 74120-3021 – (918) 583-5076
3207 S. Norwood – Tulsa, OK 74135-5409 – (918) 664-1922
1515 E. 71st Street – Tulsa, OK 74136-5041 – (918) 492-2532
9214 S. 78th East Avenue – Tulsa, OK 74133 – (918) 492-9214
400 W. Rogers Blvd. – P.O. Box 426 – Skiatook, OK 74070-0426 – (918) 396-3022
311 S. Main – Broken Arrow, OK 74012-4144 – (918) 258-4010
8299 N. Owasso Expressway – Owasso, OK 74055-2608 – (918) 274-1099
Web Site <http://www.tfecu.org>