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July 28, 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.

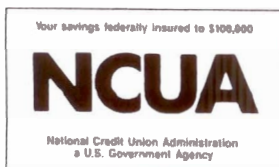
Thank you for the opportunity to comment on the member business loan proposal.

Sincerely,

A handwritten signature in black ink that reads "Mark S. Clews". The signature is fluid and cursive.

Mark S. Clews
Vice President/COO

MC/mr



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