



NATIONAL CREDIT UNION ADMINISTRATION

WASHINGTON, D.C. 20456

January 7, 1992

John F. Kinney  
President/CEO  
Electric Boat Community Federal Credit Union  
32 Chicago Avenue  
Groton, Connecticut 06340

Re: Member Business Loans (Your December 6, 1991,  
Letter)

Dear Mr. Kinney:

Your question on whether a loan on non-owner occupied real estate that is refinanced after January 1, 1992, will be considered a business loan under Section 701.21(h) of NCUA's Regulations has been referred to the Region I office for a response.

Sincerely,

A handwritten signature in cursive script that reads "Hattie M. Ulan".

Hattie M. Ulan  
Associate General Counsel

GC/MM:sg  
SSIC 3501  
91-1218A

FOIA Vol. I, C, 20 Commercial Loans