



Transmission of Sensitive Data

The information age has brought with it the ability to share, store and transmit data at the click of a mouse. The uncertain part of this equation is that the storage and transmission of sensitive data across computer systems can be difficult to protect, increasing the need for vigilance. MBL has policies and procedures in place to prevent the transmission of sensitive data by unsecure means. However, credit unions must also take steps to protect sensitive information.

Email is great tool for quick communication. However, making the assumption that the emails you are sending and receiving are secure can be very risky for each credit union and their members. MBL frequently receives plain text emails that contain sensitive data. Sensitive information should never be sent via plain text email. A good rule of thumb when transmitting data is to not send (or ask to be sent to you) anything via plain text email that you would not send on a post card.

Sensitive data includes account numbers, loan numbers, borrower addresses, social security numbers, birthdates, etc. There are appropriate and secure means available for credit unions to send sensitive data to MBL. Sensitive information can be sent by fax, secure email or uploaded to MBL's secure FTP site. Please contact MBL if you have any questions or concerns with regard to transmitting sensitive data.

SBA BASE RATES DECEMBER 2011	
WSJ Prime	3.25%*
1-Month LIBOR Base Rate	3.27%*
SBA Fixed Base Rate	5.09%*
SBA Peg Rate	3.125%**

*Effective for the first business day of December 2011
 **Effective for the period between October 1, 2011 and December 31, 2011

MBL Holiday Closures

Staff Holiday Party
MBL will close from 12:00 to 2:00 pm (MST)
December 15, 2011

Christmas Day Observed
December 26, 2011

New Years Day Observed
January 2, 2012

SBA Provides Clarification on Packaging Fees

SBA provided clarification on what constitutes packaging services in the most recent version of the SOP 50-10 5(D). According to the SOP "Packaging Services" are defined as services that "includes assisting the Small Business Applicant with completing the application, preparing a business plan, cash flow projections, and other documents related to the application."

MBL is not involved in assisting borrowers with "Packaging Services" as defined by SBA. Therefore, packaging fees for MBL services are no longer an eligible fee to be passed onto the Small Business Applicant. The credit union can decide if it would like to charge a fee for the time and effort that is put forth assisting the borrowers with "Packaging Services" activities.

The fee should be based upon an hourly rate and be customary for the services actually performed. The fee cannot be based upon a percentage of the loan amount. It cannot be a standard fee charged to all Small Business Applicants as this is prohibited by SBA.

Monthly Training Seminar

In December MBL will offer a seminar on business and equipment valuation. The seminar is part of MBL's free monthly seminar series, and is open to all credit union business lending staff.

Business and Equipment Valuation

Wednesday, December 14th

2:00 – 3:00 p.m. (MDT)

Session number: 808 345 272

Session password: Wednesday1

A link to the training will be provided in a separate email.

For more information contact Sarah Hettinger at (801) 545-7958 or SHettinger@mblllc.com.

Save the dates! Advisory Council & MBL University

February 6 -7, 2012

Location: Grand America Hotel
Salt Lake City, Utah

Agenda, registration and weekend ski resort activities will be announced soon

Same-day Reporting

Effective December 15th, 2011 MBL will introduce an improved reporting process which will allow faster delivery of daily reports to all credit union participants. MBL will provide daily reports at the start of each business day, which will enable credit unions to expedite their closing processes and create a more real-time connection to the data hosted on MBL systems.

In order to make this change possible, the daily reporting deadline for borrower transactions will change. The new deadline for reporting transactions to MBL will be 10:00 PM Mountain Time, in order to be included in that day's processing.

Prior to December 15th each credit union should make any procedural or technical changes necessary to ensure that transactions are reported through the MBL Portal before 10:00 PM Mountain Time. Please contact Shawn Kisana at 801-545-7945 or skisana@mblllc.com with any questions.

SBA Proposes More Size Standard Increases

A proposed rule published November 15 for comment in *The Federal Register* by the SBA would adjust the size definition of small businesses in 29 industries ranging from real estate and property management to colleges, junior colleges and universities.

The proposed adjustments to size standards in 20 industries in Sector 53 of the of the NAICS, "Real Estate and Rental and Leasing," and in nine industries in Sector 61, "Educational Services," reflect changes in marketplace conditions in those sectors.

In both sectors, the proposed changes are based on annual gross revenues. The standards define how large a business can be and still qualify as small for federal government programs. The dollar limits refer to annual revenues averaged over three years.

Interested parties can submit comments on these proposed rules on or before January 17, 2012. Comments can be submitted online at www.regulations.gov.

The MBL Mission:

"To aid, counsel, and assist our participating credit unions and the member businesses they serve"