

## Technical Issues Memo 23-16

**To:** NADCO Members (Please disseminate to all appropriate personnel)

**From:** Rhonda Pointon, Vice President of Regulatory Affairs, Training and Support

**Subject:** Final Version of NADCO's Comments on the 504 Debt Refinance Program,  
RIN: 3245-AG79

**Date:** July 25, 2015

Please find below the final version of NADCO's comments, submitted to the SBA this afternoon, for the 504 Debt Refinance Program. Since the last draft comments, distributed in TI 21-16, minor edits and additions to the language have been made, including the addition of a paragraph regarding the clarification of "loan" and "indebtedness", paragraph three under the Qualified Debt section.

We cannot overstate how **critically important** it is that **ALL** NADCO members take time to review the Federal Register and SBA Policy Notice 5000-1382 (see links below) and submit comments directly to SBA. Historically, we have seen that the number of comments from "interested parties" affects changes to regulations, and therefore it is vital that all review the notice and submit comments independently of NADCO. **Comments must be submitted to SBA by 11:59pm EDT today!!**

**We encourage you to review and utilize the NADCO Comments to inspire your response.** Feel free to cut and paste portions or entire sections for your own use.

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[NADCO Comments](#)

[Federal Register / Vol. 81, No. 101](#)

[SBA Policy Notice 5000-1382](#)

[Instructions - How to Submit Comments](#)