

From: [Howard Gordon](#)
To: [Regulatory Comments](#)
Subject: TBA opposes the NCUA's proposed rule to dramatically expand credit unions' authorities for Member Business Loans and Commercial Lending
Date: Wednesday, July 22, 2015 3:56:51 PM

Howard Gordon
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San Antonio, TX 78232

July 22, 2015

Dear Gerard Poliquin,

As a Information Security Officer working for a Texas based bank and an active member of Texas Bankers Association, I am personally opposed to the expansion of Credit Unions and their abilities to encroach on the Community Banking space without the normal burdens of Taxes & Regulations that banks are continually burdened with.

NCUA is overstepping its regulatory reach by expanding business lending loopholes. This proposal is contrary to congressional intent to limit business lending by credit unions. In 1998, Congress made it clear that credit unions should be focused on consumer lending, not commercial lending. Congress instituted restrictions on business lending deliberately: "to ensure that credit unions continue to fulfill their specified mission of meeting the credit and savings needs of consumers, especially persons of modest means, through an emphasis on consumer rather than business loans." By proposing this rule, the NCUA Board has blatantly disregarded congressional intent. NCUA should not undermine specific limitations by Congress nor expand the taxpayer liability.

In my humble opinion, they need to play in the same ballpark by the same rules as Banks.

Respectfully submitted,

Sincerely,
Howard Gordon