



UNITED COMMUNITY BANK

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July 24, 2015

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Gerard s. Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428

JUL27'15 PM 2:29 BOARD

Dear Mr. Poliquin,

I'm writing in opposition to the recent NCUA proposal that would dramatically increase the authority for Credit unions with regard to increased Business and Commercial lending. This request should be done statutorily through Congressional action after legitimate debate on the issues by Congress.

The proposals would have the effect of significantly increasing business loans that Credit Unions can make while also removing important safety and soundness issues that are paramount to prudent commercial lending. The proposal amounts to an end run around the statutory cap on business loans that were established by legislative action.

The ability of the NCUA to properly supervise both the existing and future growth of Commercial and Business credits at Credit Unions would be severely impacted by this unwise expansion of Commercial and Business lending.

Our Bank and competing lenders currently serve the credit needs of Business and Commercial borrowers in our trade area in a very satisfactory manner. A branch of a large Credit Union is currently located in our town and additional Commercial and Business lending is not needed, particularly by a lender that enjoys a very significant tax advantage over commercial lending institutions.

Yours truly,

Charles L. Cavanagh  
President

Cc: Amy Klobuchar      United States Senate  
Al Franken              United States Senate  
Collin C. Peterson      United States House of Representatives