

# BRUNING STATE BANK

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Gerald S. Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428

JUL 27 '15 PM 2:29 BOARD

Dear Gerald S. Poliquin:

I am writing in regard to my concern on the National Credit Union Administration's proposal to expand credit unions authorities for Member Business Loans and Commercial Lending.

As you are aware, Credit Unions were originally chartered to provide personal financial services to a defined group of people. In 1998, Congress made it clear that credit unions should be focused on consumer lending. Congress at that time put restrictions on business lending to ensure credit unions continue to fulfill their specified mission of meeting the credit and saving needs of consumers. By proposing this rule the NCUA is disregarding congressional intent.

Credit Unions have not demonstrated they are equipped to be involved in lending to business, as member business loans were a significant contributing factor for the supervisory concern on nearly half of the credit unions with CAMEL ratings of 3, 4, or 5 that made business loans.

Relaxing the regulatory standards is contrary to NCUA's charge of protecting the industry's insurance fund, and is effectively putting the tax payer at risk.

Our Bank and many other community banks throughout the United States are focused on lending to small business. At our bank over 90% of our loans are made to small businesses within the communities we serve. We have been lending to small business for over 100 years. We already have plenty of other banks which aggressively compete with us to make small business loans.

Allowing credit unions to making business loans will not help small business nor will it help the communities we all live in.

Sincerely,



Darrell Raum, Senior Vice President

**YOUR COUNTRY BANK**  
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