

From: [Rick Fowler](#)
To: [Regulatory Comments](#)
Cc: senator@feinstein.senate.gov; senator@boxer.senate.gov; ami.bera@mail.house.gov
Subject: Rick Fowler"s Comments on Proposed Rulemaking for Member Business Loans, Part 723
Date: Tuesday, July 28, 2015 1:24:30 AM

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

Dear Mr. Poliquin,

From the perspectives of a credit union member for many years and a banker, I find the continued expansion of credit unions toward riskier commercial investments and unrestricted membership a threat to the safety and soundness of the slowly recovering yet fragile banking system of the United States. As small banks such as mine struggle to serve small businesses through innovative but capital intensive programs such as our award-winning SmartBizLoans.com, while meeting the highest standards of safety and soundness, we see a different standard and less business lending experience within credit unions and the NCUA itself. This proposed expansion into business lending is not in the interests of credit union members, is inconsistent with the intent of congress, undermines safety and soundness requirements, and weakens the banking system's efforts to serve small business needs.

I respectfully request that subject proposed rule be rejected.

Richard B. Fowler II
Vice Chairman
Golden Pacific Bancorp