

From: [Robert Franklin](#)
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, August 05, 2015 9:42:49 AM

Robert Franklin
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August 5, 2015

Dear Gerard Poliquin,

I am strongly opposed to expanding the powers to make commercial loans by Credit Unions. By allowing the tax advantaged Credit Union industry to expand its reach we are increasing the risk to the American people by allowing an industry that by its very essence is to concentrate on making consumer loans to enter a part of the industry that they lack resources, talent, expertise, and sufficient regulatory oversight. The safeguards that have taken decades to refine in the banking business do not exist in the Credit Union industry.

The increased rate pressure caused by allowing a tax advantaged entities to compete with the banking industry could cause poor decisions based on competition and hurt both the banking industry and the Credit Unions. The playing field is not equal.

Seems to me, until they have fulfilled the tremendous need for consumer loans that exist today there is no real need to allow them to move off their original purpose. We should be encouraging them to redouble their efforts to do the work they were chartered to do.

Sincerely,
Robert Franklin