



August 7, 2015

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

Dear Sir,

I am writing in reaction to the credit union expansion proposal that you have recommended. My reading of the legislation indicates that it would expose your fund to greater risk than currently exists. I believe since 2010, at least five credit unions have failed due primarily to poor business loan programs. It seems counterintuitive therefore, that the National Credit Union Administration (NCUA) would seek to give power to credit unions to expand their business lending. My interpretation of the proposal is that the business loan participations would not count towards an existing cap and would remove regulatory oversight of the concentrations that would build up. It also appears to me that the intent is to exceed the statutory authority without seeking the feedback from Congress. Lastly, I find it amazing that the regulations seek to eliminate the requirement of personal guarantees and loan-to-value limitations. Looking historically at previous era, there was great stress on our insurance funds; these were prime causes of the damage done to the insurance funds.

I think the NCUA needs to revisit its purpose. It appears the NCUA is overstepping its scope by creating loopholes. I believe it is clear that in 1998, the United States Congress made it clear that credit unions should be focused on consumer lending, not commercial lending in an effort to ensure the credit unions continue to fulfill their specified mission of meeting the credit and savings needs of consumers, especially persons of modest means.

In my market, I believe that the needs of the business community are being met whether the borrower is large or small. In fact, new business has slowed to the point where new loans are generally only being stolen from another lenders portfolio. I do not believe that a survey would show that there was an unfilled economic need. I strongly urge the NCUA not to proceed with the desired expansion of commercial lending as proposed.

Sincerely yours,

Joel G. Crowell
President

cc: Senator Edward Markey
Senator Elizabeth Warren
Congressman William Keating