



HARVEST BANK

AUG21'15 PM 1:42 BOARD

Aug. 17, 2015

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

RE: Comments on Proposed Rulemaking for Member Business Loans, Part 723.

Dear Mr. Poliquin:

I am writing to the National Credit Union Administration today to urge you to withdraw the proposal to "modernize" the NCUA's member business lending regulation. Ours is a \$130 million community bank with 4 locations in primarily rural areas. We are small, and our communities are small. No doubt you have studied German History and know that ours qualifies as a gemeinshchaftliche, not gesellschaftliche, financial institution.

I'll make just two points. 1) Credit unions, which probably got their inspiration from their 19th century German equivalent, were designed to serve those who were excluded from, or ignored by, mainstream financial institutions. This is no longer the case for most credit union members. (2) Extending the reach of credit union commercial activity is a fundamental distortion of the credit union mission and should have no place in the marketplace.

Thank you for considering my views.

Sincerely,

Robert Meyerson, Chairman

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