

Aug. 17, 2015

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

AUG25'15 PM 1:33 BOARD

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.

I live and work in a small community. I work at The First National Bank of Moose Lake, in small town USA, Moose Lake, Minnesota. Our Bank is about 80million in assets and we have a very aggressive Credit Union down the block about \$173million in assets. They recently merged with Members Credit Union to now form some Mega-credit union. Point being, they are making plenty of commercial loan already and do not need their rules relaxed any more. If more commercial lending is desired, tax exempt status must be the trade.

Credit unions receive tax and regulatory advantages because they once served "people of modest means." If the benefit of tax-advantaged credit is supposed to support low- and moderate-income individuals, why would the NCUA continue expanding lending opportunities to commercial entities? Instead, the NCUA should work to ensure that credit union branching patterns, product offerings and advertisements support their tax exempt mission of serving low- and moderate-income people. The taxpayers subsidizing the credit union industry should get a better return on their subsidy. Giving tax-advantaged credit to corporations is poor public policy, which is why Congress repeatedly denied the credit union industry's requests.

Over time, some credit unions have remained true to the original credit union model. They continue to have a tight common bond, and they continue to focus on serving the credit needs of individuals, and especially people of modest means. Other credit unions have become massive institutions serving wealthy people and corporations. Instead of limiting these non-traditional credit unions, the NCUA rewards them by giving them the additional authorities they want and by requiring no accountability with respect to their "common bond" and their true tax-exempt mission. This proposal proves why the NCUA was rightfully called a "cheerleader" for the credit union industry.

Sincerely,



Jerome Bennett

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