

From: [Nick Meyer](#)
To: [Regulatory Comments](#)
Subject: Member Business Loan Comment
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12 CFR Part 723	Member Business Loans; Commercial Lending	06/18/2015	08/31/2015	Click Here
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Hello NCUA:

As we all know, Credit unions were formed to faithfully serve their members and communities. History clearly shows that the not-for-profit cooperative structure significantly helps better achieve that goal.

Obviously, many, though not most, members are self-employed and are business owners. One could reasonably assert that NCUA's primary mission to help credit unions safely achieve their mission.

In doing so, NCUA must protect the deposit insurance fund and public image of credit unions.

Big losses are shared by all credit unions in this cooperative structure.

We experienced this first hand only a few years ago.

NCUA should not approve changes to business lending that inordinately create excessive risk to the NCUSIF.

If natural person credit unions, their management and their members want to take on extra risk and underwrite then portfolio considerably more commercial loans than currently allowed today, they should have that right (provided sufficient capital and expertise).

Credit unions are smart and have the best of intentions, no doubt.

But to protect other credit unions, perhaps this might best be accomplished under the protective umbrella of a CUSO: Credit Union Service Organization.

It seems CUSOs are a good answer to many questions and concerns, even the one's brought by commercial, for-profit, banks.

Seems worth considering.

Thank you very much.

Best regards and wishes.

Nick Meyer



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