

July 21, 2015

Gerard S. Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandra, VA 22314-3428

Via email to: regcomments@ncua.gov

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

Dear Mr. Poliquin:

Please reject this unnecessary and risky new rule for member business loans.

It is unnecessary since credit unions were established to serve "consumers" of modest means. This is a direct contradiction of Congress intent for credit unions. The institutions looking into this power are generally very large and far adrift from the original employer based, employee-run means of lending the savings of fellow employees to fellow employees.

It is risky since credit unions have consistently moved into imprudent lending with higher failure rates than credit unions that stick to the original mission of serving "consumers" of modest means.

Why would a credit union in Wisconsin serving "consumers" of modest means need to make a loan 500 miles away in another state for a commercial building for a retail business? This recently happened in our market. This is risky and makes no sense of the original "mission" assigned by Congress. Why should a business far from home in a different state receive a credit union loan at taxpayer expense?

Please reject this proposal.

Thank you.

Sincerely,



Steven A. Grell
Chairman
SG:db

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