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Subject: Opposition to Commercial Lending Expansion for Credit Unions
Date: Thursday, July 23, 2015 3:34:29 PM

Dear Mr. Gerard S. Poliquin,

I would like to express my deep concerns about the proposal to expand Credit Union business lending.

First of all, the NCUA is certainly overstepping congressional intent to limit business lending by credit unions. Congress has made it clear that credit unions should be focused on consumer lending and not on commercial lending. Congress took this position to ensure that credit unions continue to fulfill their specified mission of meeting the credit and savings needs of consumers. The mission of credit unions was and is to take care of persons of modest means. By proposing this rule, the NCUA is blatantly disregarding congressional intent. The NCUA should not undermine specific limitations by Congress nor expand the taxpayer liability.

Secondly, the NCUA's proposal would pose a huge safety and soundness risk to the financial system. The NCUA is not prepared to supervise the expanded commercial lending portfolio's from a safety and soundness position. Our country experienced the same issues back in the 1980's and 1990's when the Savings and Loan industry expanded their commercial business lending without the necessary regulatory oversight. In addition, relaxing the regulatory standards is contrary to NCUA's charge of protecting the industry's insurance fund, and effectively places the taxpayer at risk.

The commercial and community banking industry has taken care of small business lending programs for our markets for many years. Our bank serves our customers with 275 branches in a four state area. We have seasoned lenders who take care of our markets. I feel strongly that expanding credit union's lending powers would negatively impact these community banks by competing with another lender with little expertise in business lending and having limited regulatory supervision.

I look forward to your response.

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