

**From:** [Tucker Loomis](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments on NCUA proposal for expanded lending part 723  
**Date:** Thursday, July 23, 2015 12:34:10 PM  
**Attachments:** [image001.png](#)

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Mr. Gerald S. Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke St.  
Alexandria, Virginia 22314-3428

Dear Mr. Poliquin:

I am writing to comment on the NCUA'S proposal to expand Credit Union lending. I think the NCUC is overstepping its regulatory reach by expanding the Business lending loophole. In 1998 Congress made it clear that Credit Unions should be focused on consumer lending, not commercial lending. Congress deliberately imposed restrictions on business lending to ensure that Credit Unions fulfill their specific mission of meeting the credit and savings needs of consumers, especially consumers of modest financial means. By proposing the change, the NCUA Board has blatantly disregarded Congressional intent.

We compete directly with a 300 million dollar Credit Union in our community. There appears to be lack of strong underwriting standards and little regulatory supervision by the NCUA in the area of commercial lending already. If lending powers are further expanded as proposed, safety and soundness could be weakened to the point of impacting their industry and insurance fund. Commercial lending can be very complex and challenging and should regulated in a consistent and equal manner by all regulators. Removing important safety and soundness checks and balances like requirements for personal guarantees, loan-to-value limitations and reduced collateral requirements encourages financing large commercial deals with much potential risk. Regulatory uniformity and consistency is imperative in the financial industry to protect borrowers in the long run.

Sincerely,

R. S. Loomis  
Vice President | Cashier



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