

From: [Cindy Hillesheim](#)
To: [Regulatory Comments](#)
Subject: Comments on Proposed Rulemaking for Member Business Loans, Part 723
Date: Friday, July 24, 2015 2:32:38 PM
Attachments: [image001.png](#)

Mr. Gerard S. Poliquin
Secretary of the Board NCUA
1775 Duke Street
Alexandria, VA 22314

Dear Mr. Poliquin:

The NCUA proposal to expand credit union lending concerns me for several reasons:

- NCUA 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 union fulfilled their specified mission of meeting the credit and savings needs of consumers; particularly the consumers of modest means. This proposal shows the NCUA Board has blatantly disregarded the congressional intent.
- We compete directly with a 300 million dollar credit union. We have seen first-hand their lax underwriting standards for commercial loans. (And what seems to be very little regulation by NCUA) Once credit unions expand into business lending, I believe we will see serious safety and soundness issues for the credit union.
- The rule removes important safety and soundness checks and balances with the elimination of the requirement for personal guarantees, loan to value limitations and collateral requirements.

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