

JUL27'15 PM 2:30 BOARD

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

RE: Proposed Changes in Business and Commercial Lending

Gentlemen:

As President of a mutual savings bank which is regulated by the FDIC and the State of Ohio, I am very concerned about your proposed rule which will not count non-member business loan participations toward the statutory cap and eliminate regulatory oversight of concentrations of these loans. In effect, this change will make the statutory cap meaningless! Further, it will remove important safety and soundness checks such as personal guarantees, loan-to-value limitations and collateral requirements.

Clearly many important lessons were learned from our most recent banking crisis and your proposed changes are really counter to sound banking regulation. Further, I am concern about your Administration making changes which should only be made by Congress.

I would hope that you will return credit unions to fulfilling the very specific mission of meeting the credit and savings needs of consumers who have modest means. It was the intent of Congress for the banking community to service the needs of business and not credit unions.

Finally, if you to expand the powers as proposed the risk to the taxpayers will be large. It will be sad that you have ignored the lessons from history!

Very truly yours,



Robert T. Lameier
President & CEO

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