

From: [Kurland.Cherie](#)
To: [Regulatory Comments](#)
Subject: FW: NO to NCUA's proposed expansion into business lending
Date: Wednesday, July 29, 2015 4:25:49 PM

From: Kurland.Cherie
Sent: Wednesday, July 29, 2015 11:59 AM
To: 'mailto:regcomments@ncua.gov'
Subject: NO to NCUA's proposed expansion into business lending

I've said this before both to Congress and to ABA – enacting this would be a pyrrhic victory for credit unions and would ultimately lead them to go the way of thrifts. They won't have the underwriting expertise, and their only advantage is their tax exemption, which should be eliminated. My Regional bank, \$177B assets, spends millions or more annually in researching, developing and implementing very sophisticated statistical and analytical procedures for the credit analysis needed to ensure that it does *safe and sound* lending to its business clients. The clients need that, and benefit from it - the smaller business clients can learn a lot about managing their businesses through discussions with the same bankers who realize that those clients cannot handle the proposed debt. We've seen what happens to the entire US economy when mortgages are made too freely; we don't need the same scenario with small business lending.

Credit unions do serve a valuable purpose, as long as they stick with their original mission. Too many people in this country choose to go unbanked, therefore at the mercy of the payday and similar lending businesses, and credit unions are designed to reach that audience. But they must stick with that original mission.

If they aim to compete with commercial banks, then they should give up their tax credit. Regardless, they risk the same fate as the thrift industry should they be allowed to expand into business/commercial banking.

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