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August 4, 2015

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

RE: NCUA expansion of credit union business lending

Dear Mr. Poliquin:

I am greatly concerned about the expansion of business lending proposed by the NCUA. It is one thing to directly compete against ever growing, tax exempt, credit unions but it is entirely another thing to see that NCUA wants to expand to commercial business lending where they lack experience and expertise in this field.

From the research I have seen, the credit unions that have failed a consistent theme was member business loans. Losses from business loans come at lenders faster than would a normal loan at a credit union. I can say this due to my 35 years of experience in commercial/business lending. Now is NOT the time to relax credit standards and expand without the expertise to really know what they are getting into. Credit Unions focus should be on consumer lending and not tax supported commercial/business lending.

During the course of my career, commercial loan losses are the majority of the loan losses the Banks I have worked for have experienced. Commercial real estate is entirely different than Agricultural Real estate for one can still grow something on Ag ground. Empty buildings produce NO INCOME, just expenses. That is what is really scary about this proposal.

I implore the NCUA to stay focused on the original mission of Credit Unions, consumer lending. This expansion to business lending without the necessary expertise should be stopped. Thank you.

Sincerely yours,

COLUMBUS BANK AND TRUST COMPANY

A handwritten signature in blue ink, appearing to read 'Jeff Johnson', is written over the typed name and title.

Jeff Johnson  
President