

From: [Kurt Johnson](#)
To: [Regulatory Comments](#)
Subject: Kurt Johnson Comments on Proposed Rulemaking For Member Business Loans
Date: Tuesday, August 04, 2015 5:27:09 PM

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

Dear M. Peloquin:

It has come to my attention that the NCUA is proposing a rule to increase credit unions' authorities for member business loans and commercial lending. I find it offensive that the NCUA would side step Congress by proposing this rule.

Community banks in west central Wisconsin have a record of serving the needs of the business community for over 100 years. In our case 125 years of serving the Whitehall Wisconsin area.

Royal Credit Union with a branch in our community has \$637,267,284 in Total Business Loans as of June 30, 2015. This appears to be 45% of their total loans as of the end of June. I understand that Royal was grandfathered in with no limit on their business lending authority.

As a banker I think that I could accept an increase in business lending authority under the following conditions. That any increase in authority be subject to income taxation for that credit union and that the credit union operate under the same set of rules and regulation as commercial banks.

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