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July 23, 2015

Gerard S. Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke St
Alexandria VA 22314-3428

RE: Proposed Rulemaking for Member Business Loans, Part 723

To Whom It May Concern:

NCUA's proposal poses serious safety and soundness concerns. NCUA has not established that it is prepared to supervise institutions with expanding business loan portfolios, and the credit union industry has proven ill-equipped to make such loans. The level of delinquent member business loans has dramatically risen which is a clear indication that credit unions and NCUA itself, were ill-prepared for the additional responsibilities and risks associated with commercial lending.

Relaxing the regulatory standards is contrary to NCUA's charge of protecting the industry's insurance fund, and effective places the taxpayer at risk. NCUA is overstepping its regulatory reach by expanding business lending. This proposal is contrary to congressional intent to limit business lending by credit unions. In 1998, Congress made it clear that credit unions should be focused on consumer lending, not commercial lending. By proposing this rule, the NCUA Board has blatantly disregarded congressional intent. NCUA should not undermine specific limitations by Congress nor expand the taxpayer liability.

"Regulatory relief" does not mean promoting explosive growth of the credit union industry at the expense of taxpayers, community banks, or the communities those banks serve. These proposed changes would exponentially expand that tax subsidy while creating significant safety and soundness concerns. We are asking the NCUA to reconsider their proposal.

Sincerely,

Stacey Bentley
President & CEO

cc: Senator Charles Grassley
Senator Joni Ernst

Member FDIC