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July 24, 2015

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

Re: NCUA Proposal to Expand Member Business Loans (Part 723)

Dear Sir:

Thank you for considering comments to the proposal to expand credit union member business loans. I am president of typical small town community bank. We serve three wonderful small counties in deep East Texas. We offer all kinds of consumer, real estate, and business loans to all three counties that we call home. Currently, there are two credit unions in all three counties as well several other community banks.

I understand the traditional credit unions purpose and feel that they have a sound purpose. However, it is my opinion that the tax-free exemption was for the purpose of individual member personal credit needs, not commercial lending.

Furthermore, increasing commercial lending poses serious safety and soundness concerns. Several Credit Unions have already failed in recent years due to lack of preparedness for this style of lending. I feel that NCUA is overstepping its regulatory reach by allowing loopholes to increase business lending.

I ask that you please consider Congress' limitations that are clearly set and in place. Your industry, your customers, and the taxpayers are all counting on you. Thank you again for allowing comments to this proposal.

Sincerely,

Will Lucas
Shelby Savings Bank, SSB
President/COO

CC: Congressman Louie Gohmert
Senator Ted Cruz
Senator John Cornyn