



August 12, 2015

RE: NCUA Proposed Rulemaking for Member Business Loans

Hello,

As a business lender at a small community bank, I believe the NCUA's plan will cause long-term issues with not only their Credit Unions but also the businesses they are trying to serve. The credit unions lack the expertise to properly structure or risk a business customer to make sure it is not only beneficial to the members of the credit union but also the customer receiving the loan.

Loose regulations and a poor understanding of business lending can have serious consequences to the subject business and the local economy. In the event of a default, the customer loses their investment in the business, their employees are now jobless which affects the local economy and the members of the credit union are at risk.

The Credit Unions state that they are trying to reach an unfilled need or market by reaching out to the business customers. Loose regulatory policies will not help businesses succeed in the long run, they need an experienced lender that understands their business and wants to make sure they are financial stable.

As a predominately business bank, we have maintained strong loan to deposit ratios ranging from 80-99% even throughout 2008-2009. We have fulfilled the needs of our business customers and work with them closely to find the best financing options for their needs. The regulations we abide by were established to be beneficial to all parties involved. To brush aside these regulations and allow credit unions to expand into a field they are ill-equipped will do more harm to the businesses they are trying to assist.

Sincerely,

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