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AUG 15 10:42 BOARD

August 5, 2015

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

Re: Credit Union Expansion

Dear Mr. Poliquin,

I have been in the banking industry for over 18 years. The majority of my experience has been with community banks doing underwriting and lending to small businesses. Through these 18 years I have experienced some good times and some not so good times in the banking industry.

Usually the tough times are a result of poor lending standards, either from unethical behavior or untrained individuals having responsibilities that they are not equipped for. The community banks that I have worked for have a great track record of training analysts/underwriters to properly underwrite a loan. This combined with good management, experience and policies of that management to support safety and soundness results in the lending business working efficiently and with minimal loss.

Allowing credit unions to stray from their specified mission of meeting the credit and savings needs of consumers, especially persons of modest means, through an emphasis on consumer rather than business loans through the proposed rule will impact the community bank's ability to serve customers as well as increase the potential for losses due to the lack of safe and sound practices. Credit unions are not as experienced in commercial lending as banks (which still have issues), and without this experience it is only a matter of time before a crisis arises.

Regards,

Stephen Alaniz
Senior Vice President – Cinco Ranch
Icon Bank of Texas, NA

