

From: [Matt Packard](#)
To: [Regulatory Comments](#)
Subject: Comments on Proposed Rulemaking for Member Business Loans, Part 723" in the subject line.
Date: Friday, August 21, 2015 3:52:22 PM

Dear Mr. Poliquin,

Thank you for the opportunity to submit comments regarding the proposed rule regarding Member Business Loans, Part 723. Your willingness to collect comments is appreciated by the financial industry and the public as a whole.

Utah has been at the forefront of the credit union expansion. We have felt the effect upon our institution over the past number of years. Nevertheless it is important to know that we support credit unions and their original mission. The mission to fulfill the financial needs of those with small means is critical to everyone's mission to help society as a whole. This is the same mission that community banks serve and have served through the years.

Your proposed rule change to allow credit unions to expand their business lending has a number of serious consequences if implemented.

- Congress has addressed this issue a number of years ago. Further 'tinkering' with the guidelines outlined by Congress will certainly open up the issue again with Congress and the overall tax exempt issue that credit unions now enjoy.
- Credit Unions further expansion into business lending pose serious safety and soundness concerns. History has shown that most credit unions lack the experience and knowledge to deal with many of the small business requests thus creating greater risk to the NCUA and its insurance fund.

Central Bank has been actively involved in small business lending for over a hundred years. We continue to serve them through good times and bad. Their needs are not being ignored but are being fulfilled at Central Bank.

We encourage you to say within the guidelines and laws at they are presently constituted.

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