



Profinium, Inc.  
Fairmont, MN  
Mankato, MN  
Owatonna, MN  
Truman, MN

August 17, 2015

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

AUG25'15 PM 1:38 BOARD

RE: Comments on Proposed Rulemaking for Member Business Loans, Part 723.

Dear Mr. Poliquin:

I urge you and the National Credit Union Administration to withdraw the proposal to "modernize" the NCUA's member business lending regulation. As the CEO of a \$325,000,000 Community Banking organization in Southern Minnesota, I'm appalled and concerned about the extreme negative implications your far reaching proposal would have across the Community Banking landscape!

Fortunately, Congress has repeatedly rejected similar attempts because additional commercial lending authority is inconsistent with the credit unions' tax exempt mission. Why would the credit union's regulatory agency promote such powers when they have consistently been rejected..., are you concerned about your job security? This proposal is strategically reckless and substantially inconsistent with your mission of serving people of modest means. The NCUA has been criticized for being a "cheerleader" rather than a regulator and actions like this proposal show why you have earned that reputation. This proposal is clearly about giving the credit unions what they want so they can continue their rapid growth,... versus ensuring CU's focus on their real mission.

With the poor job the NCUA has done with the enforcement Bank Secrecy Act (BSA) regulations, and after admitting it is not prepared to regulate the credit unions if they make a significantly higher number of commercial loans; the only logical answer it to quickly abandon your authority expansion efforts. Credit unions are membership-based organizations and should focus on serving the needs of their individual members, and especially on people of modest means. NCUA, you have gone too far with this proposal!

Sincerely;

Marques J. Doppler, CEO  
Profinium, Inc.