

**From:** [Paul Wachowiak](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments  
**Date:** Wednesday, August 26, 2015 1:29:38 PM

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Sent from my iPhone

**August 25, 2015**

Mr. Gerard S. Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia, 22314-3428  
[regcomments@ncua.gov](mailto:regcomments@ncua.gov)

**Re: Member Business Loans; Commercial Lending Proposal; RIN 3133-AE37**

Dear Mr. Poliquin,

I am a member of a credit union in central Wisconsin. I appreciate the opportunity to comment on the National Credit Union Administration's (NCUA's) proposal to amend its member business loan (MBL) rules which govern credit union commercial lending activities.

I am very concerned that the impact of NCUA's proposal will potentially cause consumer harm with the removal of important safety and soundness safeguards. I gravely fear a change in MBL rules will result in consumer loss. To protect against such possible loss, NCUA must not eliminate the requirement for personal guaranties, nor reduce LTV limitations and collateral requirements.

I strongly oppose NCUA's use of rulemaking to circumvent the plain language of the Federal Credit Union Act, as amended by CUMAA, to expand commercial business lending by FCUs beyond that permitted by Congress. **I believe Congress is the proper venue for the type of significant change in MBL policy sought in this proposal.**

I also believe the proposal is not the type of rulemaking an independent, supervisory agency such as NCUA should engage in, as it flies in the face of its duties to: (1) examine FCU practices against the rules established by Congress—including the established limit on commercial business lending; and (2) protect consumers against possible loss due to overzealous actions related to commercial business lending activity. For these reasons, NCUA must withdraw its proposal.

I appreciate the opportunity to comment on NCUA's proposal.

Sincerely,

Paul Wachowiak  
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Stevens Point WI 54482