

From: [Margaret Rose](#)
To: [Regulatory Comments](#)
Subject: Comments on Proposed Rulemaking for Member Business Loans, Part 723.
Date: Wednesday, August 26, 2015 2:52:52 PM

Gerard Poliquin
National Credit Union Administration
Alexandria DC 22314

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

Dear Gerard Poliquin:

I am writing in response to the proposed changes that would greatly expand business lending within the credit union industry. I am concerned about the manner in which this proposal has been extended and about the potentially negative impact that it would have.

A recent article in the Denver Business Journal listed Bellco Credit Union as the 6th largest commercial mortgage company based on commercial loan volume in Denver last year. Even if the DBJ data does not properly include local commercial banks, the fact that this local credit union originated \$166.8 million last year in commercial loans is concerning. That single year of commercial real estate lending originations represents 66% of their 12.24% business lending cap. Clearly this is not a sustainable ratio. It indicates to me that they are getting around the cap by becoming a large CRE lender through the sellings/syndicating of a significant portion the loan volume. Whether they hold the loans or sell them they are clearly drifting from their mission and are originating business loans utilizing a tax-exempt advantage. My bank has a longstanding proven track record demonstrating the ability to underwrite and administer commercial loans in a prudent & sound manner. We are proud of our ability to serve the banking needs of our business customers, and are concerned that these new rules could allow unsafe lending by financial entities that do not have the appropriate level of experience or controls to become involved with a higher level of commercial loans and syndications. I hope you will take by concerns seriously.

Sincerely,
Margaret Rose
3033 E 1st Ave
Denver, CO 80206