

From: [Jim Clapp](#)
To: [Regulatory Comments](#)
Subject: James Clapp comments on Proposed Rulemaking for Member Business Loans, Part723
Date: Sunday, August 30, 2015 1:38:47 PM

I am writing to express my concerns about the impact of the proposed rules for the National Credit Union Administration to expand the lending authority of credit unions. I am Chairman of the Board of Middletown Valley Bank, a relatively small western Maryland community bank. It concerns me that the proposed rules will permit credit unions to expand into commercial lending, exposing tax payers to new risks. It is my understanding that credit unions have proven ill-equipped to make such loans and has not established that it is prepared to supervise its institutions.

Middletown Valley Bank's strength is commercial lending. Our business plan is to serve the small businesses in our community and we do it well. Permitting credit unions to expand into commercial lending is contrary to legislation passed years ago that limited the focus of credit unions to consumer lending.

Accordingly, I respectfully request that you consider my comments when addressing the proposed rules.

Sincerely,

James H. Clapp

Chairman of the Board
Middletown Valley Bank
Main Street
Middletown, Md. 21769

Sent from my iPad