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March 7, 2012

The Honorable John A. Boehner
Speaker
U.S. House of Representatives
Washington, DC 20515

The Honorable Nancy Pelosi
Democratic Leader
U.S. House of Representatives
Washington, DC 20515

Dear Speaker Boehner and Democratic Leader Pelosi:

On behalf of the nearly 5,000 community bank members of ICBA, I am writing to express our support for the Jumpstart Our Business Startups (JOBS) Act, H.R. 3606, in its current form, a package of bills intended to facilitate capital formation among small businesses. H.R. 3606 will improve the regulatory environment for businesses of all types and spur job creation.

ICBA expects all of the provisions of H.R. 3606 to contribute to the economic recovery. We are particularly supportive of provisions that would raise the threshold of bank shareholders that triggers SEC registration from 500 to 2,000 and increase the deregistration threshold from 300 to 1,200. Raising the shareholder registration threshold would allow community banks to raise more equity capital without tripping the SEC registration requirement that brings with it very expensive regulatory compliance costs. These provisions are specifically designed to help community banks in their efforts to raise much needed capital.

In supporting H.R. 3606 as it is currently written, we must reiterate our resolute opposition to any amendment to the bill incorporating the provisions of H.R. 1418 which would expand the commercial lending powers of tax-exempt credit unions by raising the statutory cap on member business loans. Any such controversial credit union amendment would run counter to the primary purpose of the package. H.R. 1418 is ill-conceived and misguided public policy that would serve the interests of only the largest, most complex, multi-billion dollar credit unions. It would do nothing to expand small business credit and would exacerbate the credit unions' already-significant competitive advantage over thousands of community banks serving small towns, suburbs, and rural communities across America. **If any expansion of credit union member business lending is adopted as an amendment, ICBA will be forced to oppose this package or any other legislation that includes such provisions.** Please do not allow large credit unions to hijack this promising legislation to advance their own aggressive agenda.

Thank you for your consideration.

Sincerely,
/s/
Camden R. Fine
President and CEO