



April 21, 2015

National Credit Union Administration  
Attention: Mr. Gerald Poliquin, Secretary of the Board  
1775 Duke Street  
Alexandria, VA 22314-3428

RE: Comments – IRPS 15-1 – Small Entity Definition Revision

Dear Mr. Poliquin:

ABNB FCU supports revision of the definition of a small entity. However, when compared to other regulators definition of small entity we find NCUA's proposed definition of \$100M in assets to be too restrictive. CFPB sets a small entity definition at less than \$175M for purposes of assembling panels under SBREFA. FDIC sets a small entity definition at \$300M for CRA purposes. Given NCUA's insistence on parity in its RBC-2 proposal, shouldn't parity be considered for this proposal? It is also worth noting that FDIC annually reviews its definition. Shouldn't NCUA do the same?

Based on our observations we ask that NCUA consider credit unions \$300M in assets or under as a small entity and that this threshold be reviewed annually.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Chris Anuswith', is written over a blue ink stamp of the signature.

Christopher E. Anuswith, CCUE, CUERME, NCCO  
Vice President – Risk Management