



April 23, 2014

RIN 3133-AD77

Dear NCUA,

I have had the opportunity to review NCUA: Risk Based Capital (RBC) proposal and appreciate this opportunity to provide you with my comment.

As a marketer for Triangle Credit Union, we are subjected to many regulatory compliance issues in our advertising, public relations and communications to our members. Our field of membership would certainly not understand the concept of RBC, unless it were to affect their ability to do business with their credit union.

We strive to provide our members with the most current technology, convenient branch locations, as well as, affordable loan rates and better than market deposit rates. The impact of the RBC proposal would significantly limit our lending ability; especially to the members who needs us most, the under-served.

Furthermore, to ask us to be compliant with the proposal within 18 months seems most unreasonable. I would recommend that a panel of credit union professionals, leaders within the industry, be organized to review and develop a counter-proposal to the current RBC. I urge you to consider the following: Ask yourself this question, "How much Capital is enough?" By implementing the proposal as it stands, we would be doing our members a dis-service. Our future growth in locations where credit unions are needed would be greatly affected.

A proposal of this nature, in my opinion, goes against the basic fundamentals of the Federal Credit Union Act. I urge your reconsideration to either eliminate the proposal or form a task force of credit union professionals to formulate a more workable plan.

Thank you.

Sincerely;

Richard L. Lavoie
Vice-president Marketing
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