

22 May 2014

National Credit Union Administration
Gerard Poliquin
Secretary of the Board
1775 Duke Street
Alexandria, VA 22314-3428

RE: Comments on Proposed Rule: PCA -- Risk-Based Capital

Dear Mr. Poliquin,

I am a Board Member of Community First CU in Santa Rosa, Calif. We serve more than 16,000 Members in the North Bay.

Your proposed rule will, among other things, fundamentally change the decision-making process of Boards and Managers. We will shift away from service to Members and community, and instead spend our time managing "capital at risk." What a shame for the credit union movement and its principles.

The loss in value to Members may, indeed, be greater than if CUs were subject to taxation. We see no compelling evidence the proposed rule is better than the current risk-based net worth system. Additionally, we deem the proposal as an unwanted, unneeded albatross for the industry.

Sincerely,



Carl Vanden Heuvel
Chariman, Board of Directors
Community First Credit Union

Here For Good.