



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 writing as a Board Member of Community First, a 53-year old financial cooperative based in Sonoma County, California.

Where do I start? After fully studying the proposal, I conclude it is short-sighted, ill-conceived, and riddled with "solutions" that harm rather than protect the NCUSIF.

It cannot be salvaged by tinkering or amending. This proposal, with its lack of grounding in the real world of credit unions, must never see the real world.

Sincerely,

A handwritten signature in blue ink that reads "Dan Neff". The signature is fluid and cursive.

Dan Neff  
Board of Directors  
Community First Credit Union

*Here For Good.*