



May 27, 2014

Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 55314-3428

Sent electronically to: regcomments@ncua.gov

Re: RIN 3133-AD77

Dear Mr. Poliquin:

I am writing on behalf of IntegrUS Credit Union which serves the education community and their families in a 14 county area in Northeast Iowa, Northwest Illinois and Southwestern Wisconsin. We have 1865 Members and \$19.8 million in assets. The membership of the IntegrUS Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule regarding Risk-Based Capital.

We feel that the proposed rules are not necessary and potentially harmful to small credit unions. Although we are currently below the \$50 million threshold and would not immediately fall under these complex risk-based capital rules, it is our desire to grow with the intention of exceeding this threshold in the near future.

These rules would deter our ability to grow and thrive because of the higher capital set-asides. Instead of investing in new member services and growing the credit union, we would be forced to dedicate time and capital to comply with unnecessary and unreasonable requirements. Given the potential for this new regulatory requirement we will have to devote additional resources to revisit our strategic plan and determine if we are still able to grow in the areas we feel are most necessary to serve our community.

Increasing capital requirements in this manner will put us and other small credit unions at a distinct competitive disadvantage relative to the nation's for-profit banking sector as we feel the need to restrict our growth. This is a harmful result to consumers given the demonstrated historical conservative operations of credit unions and the role credit unions played during the downturn - both as a countercyclical force (lending

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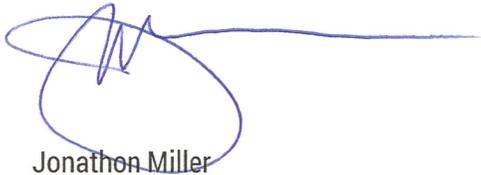
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as the banks pulled back) and a safe haven (taking in deposits as banks turned consumers away). In short, policy makers should be encouraging more of what credit unions do, not less and this proposal demands less.

It is our hope that NCUA will abandon these proposed rules and dedicate their efforts to lessening the regulatory burdens placed on credit unions, especially those credit unions under \$50 million in assets. We appreciate and applaud your efforts to strengthen the credit union system in the United States, but feel that continued "micro-managing" our operations and balance sheet through proposals such as this will be counter-productive.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'J' and 'M' followed by a long horizontal line extending to the right.

Jonathon Miller
President & CEO
IntegrUS Credit Union