

May 23, 2014  
Mr. Gerald Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Va. 22314-3428

Re: Risk Based Capital Proposal

Dear Mr. Poliquin:

I am writing on behalf of Baptist Health South Florida FCU. We serve about 11,000 members and have \$49.8 million in assets. Our Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action – Risk Based Capital.

**I urge you to start over with your new rule!** NCUA started at the top (in the office) and is now working downwards. The disconnect created by this method is tremendous.

The need for credit unions to be strong financially has our full support. However, since credit unions build capital the old fashioned way, slowly through net income. This proposed rule could severely limit the ability of credit unions to grow, increase our products and services, help our local communities prosper and increase capital.

In fact, we believe the proposal could actually serve to weaken our industry in the future because as we grow slower, we will not be able to innovate as fast as our competitors making us less relevant in the consumer market place.

I feel in your zest to regulate credit unions, especially those with IRR, to protect the share insurance fund that you are extending far too much authority to examiners. I suggest they should do a better job of using their existing authority before delving into new areas without first establishing a need for new rules.

Start over. Change your rigid position. Listen to CEOs, listen to Trade Organizations and listen to your field examiners and I am sure NCUA will develop an effective and more constructive Risk Based Capital rule.

Sincerely,

Michael Raley, President/CEO

CC

Bill Nelson, U.S. Senator  
Marco Rubio, U.S. Senator  
Ileana Ros-Lehtinen, U.S. Representative