



381-391 Main Street · P.O. Box 741 · Lewiston, Maine 04243-0741
(207) 784-5435 · FAX (207) 786-0495 · 1-800-281-5435

May 19, 2014

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

RE: Risk Based-Capital Proposal

Dear Secretary Poliquin:

I am writing on behalf of Rainbow Federal Credit Union, which serves Androscoggin, Oxford, New Gloucester and Gray. We have 21,483 Members and \$183,949,741 in assets. Rainbow Federal 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.

Our credit union does not support NCUA implementing a more sophisticated risk-based capital framework, nor do we support NCUA's proposed risk-based capital regulation. We believe that a number of risk weightings, especially for MBLs and mortgage concentrations do not appear to be properly calibrated for credit unions. We are concerned that examiners could request even more capital.

It is our opinion that interest rate, concentration and liquidity risks should be guarded against in the risk-based capital framework. Our credit union also feels that real estate and member business loans' weightings should have different risk weights based on whether they are current or delinquent. We do have corporate perpetual capital, and we do not agree with the risk weighting of 200 percent for corporate perpetual capital because corporate credit union perpetual capital is not inherently risky. With regards to CNUA's proposal to assign a risk weighting of 150 percent for investments with a weighted-average life between 5-10 years. And 200 percent for those over 10 years, we disagree with these proposed weightings. I do not agree that the length of an investment necessarily dictates the level of its risk. Finally, although we do not have CUSO investments, we do not agree with the risk weighting of 250 percent of the investments in CUSOs, as we feel that an investment in a CUSO is not inherently risky.

We also believe that any risk-based capital framework should include the ability for all credit unions, not just low-income, to have access to supplemental capital.

Inclosing, I would like to once again reiterate that Rainbow Federal Credit Union does not support NCUA's proposed risk-based capital regulation because we believe the risk weightings proposed do not seem appropriate.

Thank you for the opportunity to comment on this proposed rule and for considering our views on risk-based capital requirements.

Sincerely,

Philippe R Moreau
President/CEO

cc: File

201 Lincoln Street
Lewiston, ME 04240
(207) 784-5435
FAX (207) 783-8024

20 Washington Street
Auburn, ME 04210
(207) 784-5435
FAX (207) 786-0523

1 Lewiston Street
Mechanic Falls, ME 04256
(207) 346-3001
FAX (207) 346-3012

172 Pine Street
So. Paris, ME 04281
(207) 743-5410
FAX (207) 743-9331