

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

May 28, 2014

Dear Mr. Poliquin:

I am writing on behalf of Consumer's Credit Union. While my credit union is below the \$50 million threshold I am concerned that the risk-based capital proposal sets an unfortunate precedent that focuses on broad sweeping requirements without regard to the individual credit union or the community they serve. While standard regulations under certain circumstances may be necessary, increasing capital requirements without accounting for individual management strengths or the credit unions' expertise is troubling for all credit unions even below the asset threshold. It is discouraging for small credit unions as we look towards our future and initiatives to grow. Credit unions of all asset sizes have watched the regulatory burden increase and I encourage NCUA to rely on existing regulations and the thoughtful comments of credit unions in their regulatory efforts.

While I appreciate the exemption for small credit unions I request that NCUA account for the strengths of individual credit unions and the impact additional regulations can have on a credit union in future rulemaking.

Sincerely,

Janine Keim
CEO/President
Consumers Credit Union