



April 20, 2015

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Association (NCUA)
1775 Duke Street
Alexandria, Virginia 22314-3428

Sent via E-mail to: regcomments@ncua.gov

Re: Second Risk-Based Capital proposed rule (RBC2)

Greetings Mr. Poliquin:

Thank you for the opportunity to comment on the proposed regulation noted above on behalf of the Board of Directors and members of WEOKIE Credit Union. WEOKIE is a state-chartered credit union in Oklahoma with nearly 53,000 members and over \$1 billion in total assets.

As the credit union expressed in its comment letter on the original Risk Based Capital proposed rule, we understand the need for capital standards for financial institutions. It appears that the existing net worth requirements for credit unions have been functioning adequately and responded well to the recent severe financial crisis. In fact, the credit union share insurance fund performed much more favorably through the financial crisis than the bank insurance system which employs a capital standards regime similar to the RBC2 proposal. It does not seem logical that credit unions should move from a system that has been tested and performed admirably through difficult circumstances to a system that, under the same strains, did not perform nearly as well.

Additionally, the attorney opinion letter obtained by the NCUA does not appear to provide sufficient legal backing that the agency has the authority to establish a risk-based capital requirement for a credit union to be considered well-capitalized.

Please consider withdrawing the proposed rule to ensure it does not adversely affect the financial condition of the credit union movement, create unnecessary regulatory burdens, and inhibit the ability of credit unions to serve their members.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'B Taylor', is written over a light blue horizontal line.

Brent Taylor
President & CEO
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