



April 22, 2015

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

Re: Comments on Proposed Rule: Risk-Based Capital

Dear NCUA Board:

Thank you for giving us the opportunity to voice our concerns over the proposed rule regarding Risk-Based Capital 2.

I am the President/CEO of Isabella Community Credit Union located in Mount Pleasant, Michigan. Our asset size is \$102,000,000.

Overall, we (Board and I) like the changes made and presented in RBC-2. However, we do have two concerns.

- The first concern is regarding the risk weight for Mortgage Service Assets. We think 250% is too high of a risk factor. We suggest that it be lowered to perhaps 150%. Our mortgage underwriting is very strong and we should not be penalized with a high risk ratio.
- Second concern is regarding Capital Adequacy. We don't like the idea of giving examiners the power to impose additional capital requirements on credit unions. Credit unions should be allowed to make their own assessments of the risk it faces and it's tolerance for risk.

Thank you for your consideration. I can be reached at 989-773-5927, ext. 265 if you have any questions.

Respectfully yours,

Jay Anders, President/CEO