

April 21, 2015

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

Re: RBC Comments

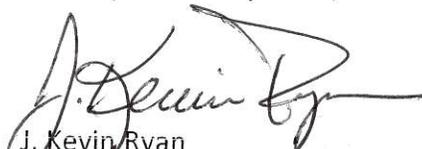
Dear Mr. Poliquin:

Financial Center First Credit Union is a \$500 million credit union in central Indiana. We appreciate the NCUA Board listening to the comments made on the initial RBC proposal and for making some needed changes. We are still not convinced that there is a need for this regulation at this time.

The Credit Union System has remained strong through the tough times of recent years and has been able to sustain itself without government rescue intervention. In addition, we pride ourselves in conservative investments and overall risk management controls of our organizations. There is no reason to supervise our system like banks because as America's consumers know we are much different. We are designed as a conduit for the common person to have access to the Nation's financial system and additional, unneeded, regulation is a great disservice to the citizens of this country. Don't continue to burden our model with more government regulations, but help America's consumers by helping us keep expenses low to offer financially attractive products and pricing!

You have read a great amount of feedback on the two Risk Based Capital proposals. Quite frankly, neither hits the mark with Credit Unions. Instead of cutting and pasting so many bullet points from so many smart industry leaders I'm just offering a little advice. The worst thing you can do with a mistake is to continue to hold onto it – let this one go!

Thank you for all you do,


J. Kevin Ryan
President and CEO