



a new direction in banking

April 24, 2015

NCUA

Re: Risked Based Capital (2) Proposal Comment Period (2)

NCUA Board of Directors,

I am writing on behalf of the staff and board of directors of People Driven Credit Union to address the concerns from our credit union in regards to the RBC2.

First and foremost we are requesting the rule be rescinded.

The strong performance of credit unions during and after the most recent financial crisis shows how we were able to weather the terrible storm through our current capital requirements.

There are still a number of risk weights that should be deleted and or lowered. By requiring risk ratings NCUA could be limiting the credit unions options to provide very essential products and services that meet our membership's needs.

One of the main areas of concern in the new requirement is that every credit union develop a Capital Adequacy Management Plan that we feel would allow examiners subjectivity to impose even higher levels of capital for each credit union.

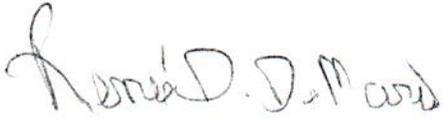
In my credit union career I have completed 11 credit union partnerships (mergers). I am very concerned with the treatment of goodwill and intangible assets that the new requirement that we will have to meet in the future. Again, limiting the choices in the future for credit unions.

The final area of concern is the additional Call Report information that will be required. Our resources in finance and accounting are currently over the capacity when the quarterly report is due. There are areas we should be focusing and analyzing but there is only so much time in a day, week and month to try and provide the most accurate

report possible. We request NCUA consider a different way to provide the very detailed information.

I would like to thank you for taking your time on this very important decision and allowing a second comment period.

Sincerely,

A handwritten signature in cursive script that reads "Renee D. DeMarco".

Renee D. DeMarco

President/CEO

People Driven Credit Union