



April 27, 2015

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

Dear Mr. Poliquin,

I appreciate the opportunity to comment on the second Risk-Based Capital (RBC2) Proposal by the National Credit Union Administration. I also appreciate the changes that NCUA made after reviewing the over 2200 letters submitted by concerned credit unions and members. The new proposal is an improvement over the first; however, I still question whether the regulation is necessary at all.

The credit union industry is unique, and credit unions have long benefitted from the member-owned structure and cooperative nature. It was this cooperative nature that helped us get through the worst financial crisis since the Great Depression in much better condition than banks. Oddly enough the very capital model that did little to protect the banking industry, is now being introduced to credit unions.

While My Community Federal Credit Union will remain a "Well-Capitalized" credit union under the new proposal, our biggest concern is the regulation will stifle growth and create a disincentive for credit unions to enter into new business services that our members want and need. We as an industry have a great opportunity to take advantage of the poor reputation that the banking industry has created for itself and improve our market share in mortgage, business, and mortgage servicing as well as expand our investment in CUSOs to provide more choices to our members and potential members. This regulation will not allow our industry to fully seize that opportunity. Further it limits choice. In business, this is never a good thing.

I respectfully request that NCUA continue to use the current model and regulations to set regulatory capital requirements for credit unions.

Sincerely,

Donna Neal  
Chief Executive Officer

[www.mycommunityfcu.com](http://www.mycommunityfcu.com)