



**Wichita Falls Teachers  
Federal Credit Union**  
(940) 692-7096 • (800) 288-1642  
Fax (940) 689-2136  
P.O. Box 4516  
Wichita Falls, Texas 76308-0516

April 24, 2015  
Mr. Gerard Poliquin  
Secretary of the Board  
NCUA

Dear Mr. Poliquin:

First I would like to say "thank you" for allowing a second comment period regarding the Risk Based Capital rule. The credit union industry appreciates the changes that NCUA has made to the proposed regulation, but asks that you continue to listen to credit unions and make additional changes before it becomes law. One of your own board members feels that it is against the federal credit union statute.

Wichita Falls Teachers Federal Credit Union was chartered in 1937 and we have grown to over 70 million in assets. We are considered to be a "closed" credit union with a limited field of membership. In the eyes of most in the financial world, we are small potatoes; but I feel that we still operate under the foundation that the credit union industry was built. I personally am glad that we are not a community credit union and our financial numbers prove that we are strong, safe, and secure with a NWR of 10.96%.

There really is no need for this regulation. Credit Unions as a whole continue to perform well year after year. WE ARE NOT A BANK and we should not be compared to a bank. The threshold for complex credit unions was raised from \$50 million to \$100 million. I believe each credit union should be examined individually based on deposit account types, member services, loan and investment types, and portfolio composition. The NCUSIF deposit is an asset with absolutely no risk, it should NOT be excluded. Supplemental capital SHOULD be included.

I have only listed a few of the many concerns in this letter. The strength, safety, and soundness of the credit union industry would be negatively impacted by this proposed rule. I respectfully ask that you consider completely doing away with this current proposed rule for Risk Based Capital.

Sincerely,

Angela Clark  
President/CEO