

April 06, 2015

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

RE: Comments on Proposed Rule: Risk-Based Capital; RIN 3133-AD77

Dear Gerald Poliquin,

I am writing on behalf of the 8,200 members of CalCom Federal Credit Union, a \$66-million asset credit union in Torrance, California. I like to thank the Board of the National Credit Union Administration for providing the opportunity to express our comments on the proposed rule on Risk-Based Capital.

Credit unions are different and although our products and services are commoditized, the manner in which we operate and make our products and services available changes the dynamics of our risk exposures. That in mind, in principle, I agree that risk-based capital is necessary for credit unions with complex operations.

Having said that, any risk-based capital plan must show balance in providing safety and soundness for the credit union industry while allowing credit union to remain competitive and a viable alternative to banks within the financial marketplace. I encourage the NCUA Board to keep that balance and credit union viability in mind as you finalize this proposed rule.

Thank you.

Sincerely,

Betty Wright
Board Chair
CalCom FCU

cc: CUNA, CCUL