

December 23, 2013

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

RE: Comments on Proposed Rule - Capital Planning and Stress Testing

Dear Gerald Poliquin,

I am writing on behalf of VA Desert Pacific FCU, which serves employees of the Department of Veteran's Affairs in Long Beach, Los Angeles, San Diego and Riverside California and in Las Vegas, Nevada. We have 4600 Members and \$56 million in assets. VA Desert Pacific FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its Proposed Rule for Capital Planning and Stress Testing.

Adequate capitalization is very important for the health of individual credit unions and for the credit union movement. Frankly, I have doubts as to the helpfulness of stress testing, but have no better solutions to address the issue of projecting adequacy over various future scenarios. I have two other concerns with this proposal that can be addressed:

If NCUA makes itself the 'independent testing entity' that means all of us will be paying for the cost of the assessments. I think credit unions required to make the assessment should procure their own independent testing (which they probably already do as part of their ALM process), which NCUA can review. It is entirely unnecessary for NCUA to duplicate (or shoulder the cost) of this testing.

Also, since we are prohibited from disclosing our CAMEL ratings and credit unions are not public entities, I see no reason for public distribution of this information either.

Thank you for the opportunity to comment on this Proposed Rule and for considering our views on Capital Planning and Stress Testing.

Sincerely,

Cindy Glessner  
CEO  
VA Desert Pacific FCU

cc: CCUL