

Services Center Federal Credit Union
609 West 21st Street
Yankton, SD 57078
April 7th, 2014

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

Re: Comment to the Proposed Prompt
Corrective Action – Risk-Based Capital
Regulation

Dear Mr. Poliquin

Services Center Federal Credit Union is a federal credit union that has been in existence since 1962. Today, our Credit Union strives to provide innovative financial services to our 6,400 plus members. This is a daunting task and one that would be impossible if it weren't for the collaborative relationships that we have with 5 CUSOs.

The proposed risk based capital regulation seems to run counter to what I stated above. The proposed regulation would penalize my Credit Union for making investments in a CUSO rather than encouraging us to make investments that would ultimately benefit our members and the Credit Union as a whole through patronage dividends from the CUSOs that we have stock in.

The proposed regulation on risk based capital needs serious reworking before it is enacted. The NCUA Board needs to have an open dialogue with credit unions regarding this proposal before it is enacted.

Sincerely



Don Fiedler
Chairman of the Board.