

From: [Terry Gresswell](#)
To: [Regulatory Comments](#)
Subject: Capital Requirements
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I am the President and CEO of Big Island FCU. We are a \$80M Asset CU in Hawaii. The new proposed Rule is interesting in that it affects the members that NCUA is suppose to be most worried about. This proposed rule will require our lending to be tightened and our investments to be even more conservative then they are now. Lets take the percent used for investing in the Corporates for example. NCUA has been basically sitting in their offices for the past several years and if there should be a ultimate safe spot to invest in my opinion it should be with them.

Also just today the FDIC just proposed new rules for the 8 largest Banks that are in line with what is going on now. If the largest financial institutions are regulated this way why are the credit union that only have 8% of all deposits in the country being unfairly burdened.

Every Credit Union is different and there can not be a cookie cutter approach to all. Credit Unions that have a plan show good positive financials and are serving the members as Credit Unions were originally started for then do not over burden them.

Terry Gresswell
President & CEO
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