



April 24, 2014

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

Re: Comments on Proposed Rule – Risk Based Capital Adequacy Proposal

Dear Mr. Poliquin:

This letter represents the views of the volunteer Board of Directors from TCT Federal Credit Union regarding the National Credit Union Administration Board's (NCUA) request for public comments on a proposed rule for risk based capital adequacy.

We represent 12,000 plus members from TCT and we share the same concerns that NCUA has that credit unions have adequate capital to protect their members' assets. We as a Board also strive to establish policies and business plans so TCT can help make a difference in our members' financial well-being. Today's competitive and regulatory environment requires us to use our capital in an efficient and effective manner in order to earn our members' business.

This is why we, the Board of Directors of TCT Federal Credit Union, are writing this letter in comment to the Risk Based Capital Proposal. We object to this proposal as being unnecessary and unfair to many safe, sound, and well capitalized credit unions such as TCT FCU.

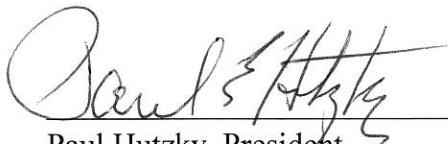
Our credit union has been able to provide its members with necessary financial products and services while maintaining a positive net interest margin, a well-capitalized rating, and while simultaneously managing through a significant recession. We would also point out that we were able to accomplish this difficult task while absorbing the externally mandated shocks of large corporate stabilization and insurance fund assessments for problems that our credit union did not create.

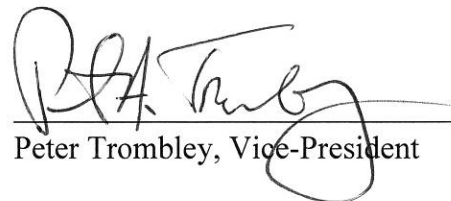
If this proposal were to be implemented in its current proposed form, our credit union would be irreparably damaged in reputation as it was reclassified from a well-capitalized credit union to an adequately capitalized credit union. Furthermore, our strategic plan if achieved could place our credit union in an undercapitalized position under this plan. Our plan under current regulations would categorize our balance sheet as well-capitalized. The new proposal prevents us from reaching out and helping more of our members and their families. Any regulation that impedes

helping our members' financial position in a prudent manner hurts members, their credit unions, and the credit union movement.

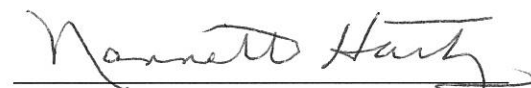
We urge you to reject implementation of this proposal as proposed; it is unnecessary and harmful to the many safe, sound, and well capitalized credit unions that continue to provide fairly priced products and services to their membership.


Respectfully,

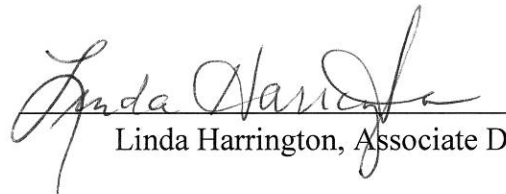

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