

May 07, 2014

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

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

Dear Gerald Poliquin,

I am writing on behalf of Fairview EFCU, which serves employees of Fairview Developmental Center (a State facility for the developmentally disabled). We have 1,455 members and \$13.5 million in assets. I appreciate the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action – Risk-Based Capital.

Most important - I do not agree that this proposal is necessary. Due to our asset size this would not affect my credit union directly at this time, but could affect us in the future.

In my experience of over 45 years in the credit union industry, examiners opinions are not consistent from one examiner to another or from one year to another. To give them authority to arbitrarily change any credit unions capital requirements based upon opinion cannot be acceptable.

If it is determined that Risk-Based Capital is necessary; then a precise, well-defined, pre-determined needs to be provide to all credit unions so that they have the ability to manage their credit unions within the required guidelines. In what I read, this has not been done. How can you permit individual examiners to have this much control over any credit union that is otherwise performing satisfactorily?

Please do not pass this regulation as written.

Thank you for the opportunity to comment on this proposed rule and for considering our views on risk-based capital requirements.

Sincerely,

Chris Coursen
CEO
Fairview EFCU

cc: CCUL