May 09, 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 McKesson Employees' Federal Credit Union, which serves McKesson Employees’. We have roughly 5000 Members and 27 million assets. McKesson EFCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action

I completely understand managing risk and that is what we have been asked to do through many channels. That would include adequately funding our Allowance for Loan Loss, based on the risk in our portfolio, Concentration Risk, identifying the level of risk we're declaring in policy as a percentage of net worth. It seems to me that this allows us to *manage our risk* and through our examinations if it's found that we have more exposure in any area, are asked or told, depending, to limit or stop a particular program. We experienced this first hand, being a participant in loans through Business Partners LLC. During an exam which followed the liquidation of Telesis CU, we were directed to cease member business lending/participation's, until they were X percent of our net worth. Completely understandable for a variety of reasons and we had no objection to this. This was based on Concentration Risk.

Now if I'm correct in my perception of what this proposal would do, it will take our *management of risk* and turns it to *managing our balance sheet*. I feel this doesn't take into consideration what a particular credit union's field of membership is or may need. Furthermore, the proposed NCUA authority to require even higher individual minimum capital requirements is overreaching.

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

Sincerely,

Christopher Bruno
CEO
McKesson EFCU

cc: CCUL