



Community Credit Union

The Wise Choice in Financial Services & Education

May 9, 2014

MAY12'14 PM 2:35 BOARD

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

Re: NCUA proposed risk based capital requirements

Dear Mr. Poloquin,

Thank you for the opportunity to comment on NCUA's Risk Based Capital proposal. EdCo Community Credit Union supports the objective of well capitalized credit unions however we believe the current proposal is overly burdensome and unnecessary.

We suggest that the present calculation for capital levels and weighing risk to credit unions capital is adequate for all credit unions and changes to such as this proposal outlines would be outside of the authority granted to the NCUA under the Federal Credit Union Act (12 U.S.C. 1790d(d)(2)).

We also express our concern over the fact that while NCUA is required to consult with State Agencies that hold jurisdiction over state chartered credit union, there is no record of such consultation.

Although EdCo Community Credit Union, at \$45 million in assets, is presently under the \$50 million asset threshold, if we were held to the new risk based capital rules our capital would decline by \$410,646, which we determine to be an unwarranted erosion of our members' ownership holdings.

Again, we thank you for the opportunity to share our thoughts and concerns over the proposed changes to RBC rules and respectfully request no further action be pursued on this proposal.

Most Sincerely,

A handwritten signature in blue ink that reads "Karolyn Wells".

Karolyn Wells
President/CEO