

**From:** [Gerald Pennington](#)  
**To:** [Regulatory Comments](#); [syashewski@cornerstoneleague.coop](mailto:syashewski@cornerstoneleague.coop)  
**Cc:** [Albert Barajas](#)  
**Subject:** Proposed Rule: PCA – Risk-Based Capital  
**Date:** Friday, May 16, 2014 11:02:13 AM  
**Attachments:** [image001.png](#)

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

Sent via E-mail to: [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

Re: Comments on Proposed Rule: PCA – Risk-Based Capital

Dear Mr. Poliquin:

I am writing to you as an employee of Security First Credit Union regarding the NCUA's proposal on PCA – Risk-Based Capital. Security First Credit Union is based in Edinburg, Texas and serves over 55,000 members. I appreciate the opportunity to comment on this very important issue.

As someone who enjoys employment through a credit union, I see and hear from members every day that share stories of how their credit union has helped them achieve their financial goals. Every day I see how members benefit first hand as the result of our credit union being able to serve them. I firmly believe that credit unions are a great asset to this country and unfair and unsound requirements like this would only unjustly burden our ability to help meet our members needs and develop the community's around us. I believe that is unfair for the NCUA to set capital requirements differently for credit unions than the FDIC sets for banks, specifically regarding an increased requirement for longer-term government-backed security's. Furthermore, more time would be needed so as to phase in such a rule.

The NCUA has not justified the need for this rule adequately given the immense burden this would put on the very parties it is meant to protect and govern. I implore you to reconsider, and thank you for your time.

**Gerald Pennington**

**AVP of Lending**

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