

From: [Robert Vidal](#)
To: [Regulatory Comments](#); syashewski@cornerstoneleague.coop
Cc: [Albert Barajas](#)
Subject: Re: Comments on Proposed Rule: PCA – Risk-Based Capital
Date: Friday, May 16, 2014 12:06:44 PM

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

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.

Thank you,
Robert Vidal III
Security First CU
Boca Chica MSR

956-621-0333 or 956-661-4000 ext. 5601

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