



PINE BLUFF COTTON BELT FEDERAL CREDIT UNION

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May 19, 2014

Mr. Gerald Poliquin,
Secretary of the Board
National Credit Union Administration
Via Email to regcomments@ncua.gov

Re: Prompt Corrective Action; Risk-Based Capital

Dear Mr. Poliquin:

This letter represents the views of the Pine Bluff Cotton Belt Federal Credit Union regarding the proposed regulation to adopt a risk-based capital requirement for credit unions with assets over \$50 million. Pine Bluff Cotton Belt Federal Credit Union's asset size is currently \$66 million.

Pine Bluff Cotton Belt Federal Credit Union opposes the regulation, as proposed, because it appears the new risk weights would not accurately reflect the actual risks held on the credit union's books. The proposed regulation will drastically affect how they do business in the future, and how they will be limited in serving their members. Also it seems the proposed regulation will discourage credit unions from making long-term investments and loans (i.e. mortgages).

Thank you for the opportunity to comment on the NCUA's proposed regulation for Risk-Based Capital.

Sincerely,

Greg James
President, CEO
Pine Bluff Cotton Belt Federal Credit Union

