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MAY19'14 PM 2:05 BOARD

May 15, 2014

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

RE: Risk Based-Capital Proposal

Dear Secretary Poliquin:

I am writing on behalf of New Dimensions Federal Credit Union, which serves the counties of Kennebec and Somerset. We have 7546 Members and \$66.7 million in assets. New Dimensions Federal Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

Our credit union does not support NCUA implementing a more sophisticated risk-based capital framework, nor do we support NCUA's proposed risk based capital regulation. We are also not in support of the current risk based net worth formula. We believe that more credit unions than NCUA has indicated would be impacted as their net worth would fall to just barely over well-capitalized or adequately capitalized levels. Additionally, a number of risk weightings, especially for MBLs and mortgage concentrations do not appear to be properly calibrated for credit unions.

It is our opinion that credit, interest rate, concentration, and liquidity risks should be guarded against in the risk-based capital framework. Our credit union also feels that real estate and member business loans' weightings should have different risk weights based on whether they are current or delinquent. We do have corporate perpetual capital, and we do not agree with the risk weighting of 200 percent for corporate perpetual capital because corporate credit union perpetual capital is not inherently risky. With regards to NCUA's proposal to assign a risk weighting of 150 percent for investments with a weighted-average life between 5-10 years, and 200 percent for those over 10 years, we disagree with these proposed weightings. I do not agree that the length of an investment necessarily dictates the level of its risk.

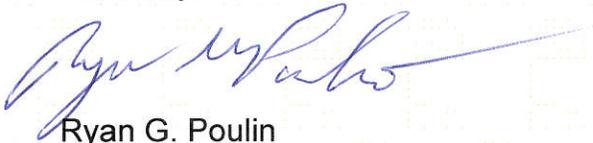
Finally, our credit union does have CUSO investments, and we do not agree with the risk weighting of 250 percent of the investments in CUSOs. If applied, this weighting would require us to change our relationship with our CUSO.

We also believe that any risk-based capital framework should include the ability for all credit unions, not just low-income, to have access to supplemental capital.

In closing, I would like to once again reiterate that New Dimensions Federal Credit Union does not support NCUA's proposed risk based capital regulation because we believe that it would adversely affect capital requirements; and the risk weightings proposed do not seem appropriate. Though some of these issues do not affect our credit union now, they will in the future.

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

Sincerely,



Ryan G. Poulin
President/CEO