



May 19, 2014

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

Via e-mail: regcomments@ncua.gov

RE: Comments on Proposed Rule: Prompt Corrective Action – Risk-Based Capital.

Dear Mr. Poliquin:

On behalf of the board of directors, management, staff and the nearly 12,000 members we serve, the Campbell Employees Federal Credit Union appreciates the opportunity to submit comments on the National Credit Union Administration's (NCUA) proposed rule Prompt Corrective Action – Risk-Based Capital (RBC). Campbell Employees FCU holds \$158.1 million in assets, and is dedicated to serving members by offering the best value in financial services.

The Board of Directors' and Credit Union Management have always prudently managed financial resources and instituted policies that provide for a profitable credit union with an appropriate capital base. The Campbell Credit Union has consistently maintained a "Well Capitalized" net worth ratio and would continue to be considered well capitalized using the proposed risk based capital requirements.

While we agree with a risk based approach for evaluating a credit union's capital position, we feel that the proposed risk based capital calculation would discouraged our credit union from serving members with Member Business Loans, Student Lending programs, and Mortgage Loans; we consider these products to be essential offerings for a profitable and competitive financial institution. We also feel that the new risk based capital requirements unnecessarily assign a risk rating to "cash on deposit" in the Federal Reserve Bank and corporate credit

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unions. Perhaps deposits insured by the Federal Government should be assigned the same risk rating as "cash on hand".

Thank you for the opportunity to comment on the proposed rule Prompt Corrective Action – Risk-Based Capital. If you should have any questions, please contact me at rturco@campbellcu.org or 1-800-257-5354, ext. 3251.

Sincerely,

A handwritten signature in black ink, appearing to read "R. J. Tuco". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Russell J. Tuco
Vice President Finance / CFO

cc: David V. Ardire, President / CEO