

May 21, 2014

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

RE: Comments on Proposed Rule: PCA - Risk-Based Capital; RIN 3133-AD77

Dear Gerald Poliquin,

I am writing on behalf of CalCom Federal Credit Union. We have \$66 million in assets and we serve 8,200 members that are primarily healthcare and city employees in the Los Angeles County area.

Thank you for allowing us to comment on this proposed rule. The following are our concerns for your consideration:

First, authorizing NCUA to require even higher capital is not parallel to the bank capital requirements which puts us in a competitive disadvantage. Credit unions that are here today have proven their safe and sound operations therefore requiring additional capital is not warranted.

Second, the proposed rule lumps all the mortgage loans in to one group which doesn't represent the actual risk we possess on our adjustable mortgage loans therefore this needs to be considered.

Third, we are planning to offer small business loans to private medical offices but with the additional capital requirements on MBLs it makes it more difficult to justify implementing this service to our Members.

Finally, our Members may ultimately pay the price with higher fees and less services which are the unintended consequences that may have been overlooked therefore I urge you not to impose this proposed rule on credit unions.

Sincerely,

Jon Hernandez  
CEO  
CalCom FCU

cc: CCUL