



**Fort Lee**  
**FEDERAL CREDIT UNION**

[www.fortleecu.org](http://www.fortleecu.org)

05/21/2014

Mr. Gerard Poliquin  
Secretary of the Board Mail  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314

On behalf of Fort Lee Federal Credit Union, we would like to thank you for allowing us this comment period regarding the recent NCUA proposed risk based capital rule.

Fort Lee Federal Credit Union is well capitalized and would remain well capitalized under the new ruling. Although in the future it could discourage business decisions to grow our credit union.

Our concerns regarding the recent NCUA proposed risk based capital rule are as follows:

We strongly recommend removing the examiner discretion provision. To give any individual examiner the authority to impose additional capital at his or her discretion is unacceptable.

We would also like to recommend a Supplemental Capital Provision. This seems to be the appropriate time to address this issue.

We would like for the new risk based capital rule not to take the one size fits all approach for credit unions with over 50 million in assets. Categorizing all credit unions over 50 million as similar in a complex nature does not seem practical as many credit unions in this asset size are simplistic in nature and well capitalized. We believe this approach needs more clarification.

We believe that the performance of mortgage and business lending portfolios should be taken into consideration not just the size of the portfolio.

We would like to see the same approach for investments. As you know, it is not necessarily the portfolio duration but the collateral as well. Investments should be rated on credit risk, not just on the maturity risk. Merely comparing the maturities of various securities cannot be a valid indicator of interest rate risk.

We also would encourage a delay in the effective date for credit unions to prepare by effectively adjusting their balance sheets.

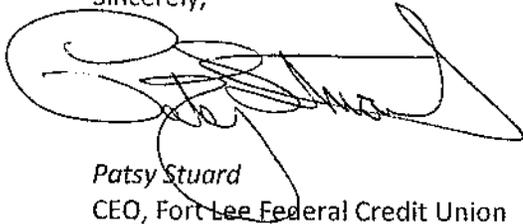
Given the health of the credit union system, this significant proposal seems to be rushed for no real apparent reason. It is our belief that more time would benefit the agency and credit unions.



In conclusion, Fort Lee Federal Credit Union supports the overall objective of ensuring that credit unions are adequately capitalized and believe that the NCUA should seek improvements in evaluating and managing risks. But we do not support the new proposed RBC Rule for the impact it will have on our members.

Once again, Fort Lee Federal Credit Union thanks you for taking the time to listen to and consider the concerns of credit unions across the United States regarding the recent NCUA proposed risk based capital rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Patsy Stuard". The signature is fluid and cursive, with a large initial "P" and a long horizontal stroke extending to the right.

*Patsy Stuard*  
CEO, Fort Lee Federal Credit Union