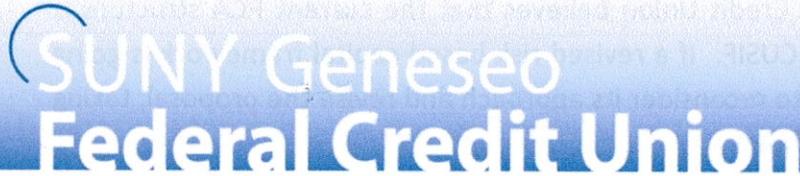


"Never Too Old or Too Large to Serve Your Individual Needs"

The logo for SUNY Geneseo Federal Credit Union features a stylized blue outline of the state of New York on the left. To the right, the text "SUNY Geneseo" is in a light blue, sans-serif font, and "Federal Credit Union" is in a larger, bold, dark blue, sans-serif font below it.

SUNY Geneseo Federal Credit Union

1 College Circle • MacVittie College Union 111 • P.O. Box 114 • Geneseo, NY 14454 • Phone: 585-245-5700 • Fax: 585-245-5701 • www.geneseo.edu/sgfcu

May 22, 2014

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

Dear Mr. Poliquin:

I am writing on behalf of State University of NY Geneseo Federal Credit Union, a \$5.8 million asset credit union serving more than 1,200 members on the campus of SUNY Geneseo in Rochester, NY. SUNY Geneseo FCU appreciates the opportunity to provide our comments to the National Credit Union Administration (NCUA) on the proposed rule regarding Prompt Corrective Action, Risk Based Net Worth.

SUNY Geneseo Federal Credit Union does not believe the Agency has justified the need for a proposed change to the PCA requirements at this time considering that during the two recent economic crises the National Credit Union Share Insurance Fund (NCUSIF) performed very well under the current PCA regulations.

There are a few issues with the proposal that we would like the Agency to consider revising. We do not believe that the corporate credit union perpetual capital should be weighted at 200%. After the corporate crisis the Agency revised the corporate credit union rule which, in part, served to encourage credit unions to invest in the corporates. The rule change was reduced the risk corporates pose to the NCUSIF and therefore the perpetual capital invested in the corporates should not be considered a high risk asset.

Finally, the proposal's risk weightings investments of 5-10 and over 10 years in maturity and investments in CUSOs assume, incorrectly, that they are inherently more risky. We recommend the Agency review the risk-weights assigned to these categories and determine if the risk-weighting is supported by the actual risk of these assets.

In conclusion, SUNY Geneseo Federal Credit Union believes that the current PCA structure is sufficient to mitigate the risk to the NCUSIF. If a revised risk based capital framework is going to be implemented, we ask the NCUA to reconsider its approach and revise the proposal, taking into account the concerns expressed above.

Thank you again for the opportunity to comment on the proposed rule.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Dillon". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Barbara Dillon

CEO

State University of NY Geneseo FCU