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Submission via regcomments@ncua.gov

May 22, 2014

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

RE: RIN3133-AD77

Dear Mr. Poliquin;

I'm writing to address the concerns I have with the current proposal for Risk Based Capital. While I understand the purpose of setting different requirements for different risks I feel this proposal could have a very adverse effect on many credit unions.

During the past three years our credit union has been examined by "unseasoned" examiners and to now give them the authority to require even higher capital for individual credit unions would be disastrous. This would be highly subjective and should be removed from the rule. Capital ratios are indicators of the financial health of a credit union and no one examiner should be able change the requirements.

Also the timeline that you are proposing of 18 months is not long enough for us to make the needed changes to our balance sheet. Banks are being given until 2019 so why would NCUA propose this short period of time for credit unions? Are credit unions more risky than banks? I certainly don't believe so.

I appreciate NCUA's willingness to listen to my concerns and hope that these concerns, along with others already submitted will influence you to implement changes to the current proposal.

Sincerely,

Jeanine D. Lopez
Vice President
IBEW & United Workers Federal Credit Union