

May 22, 2014

Mr. Gerald Poliquin
Secretary to the Board
NCUA
1775 Duke Street
Alexandria, VA 22314-3428

Dear Mr. Poliquin:

I am writing to comment specifically on the treatment of CUSO's in the proposed Risk Based Capital Regulation. Like many of my colleagues, my credit union and I are involved in several CUSO's; each provides services to us that we would have to spend significantly more on if we were to take these services in-house. We own/participate in CUSOs providing mortgage processing, item processing, business loan underwriting/servicing, data processing and several other business activities. All of which help us better serve our members in a highly competitive marketplace.

The proposed risk weighting of CUSO investments in the RBC proposal will have the long-term impact of driving credit unions away from the CUSO model towards the for-profit sector of the financial services industry. That is not in the strategic best interests of credit unions or our members.

I urge you to revisit your proposal and reduce your risk weight to no more than 100%.

Sincerely,



R. Marshall Boutwell
President/CEO