

May 21, 2014

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

RE: Comments on NCUA Proposed Rule: Prompt Corrective Action—Risk-Based Capital

Dear Mr. Poliquin,

This letter is on behalf of the North Dakota rural and agricultural organizations listed on this letter. We are writing to you to express our concerns regarding the impact the NCUA's proposed Risk Based Capital (RBC) rule could have on rural areas and its potential impact on America's farmers. Credit unions have served rural America for years by making safe and affordable agricultural related loans. It is because of this history of safe and sound loans that Congress created an exemption for rural based credit unions so that they would not be subject to the 12.25% cap on business lending. If the (RBC) rule were to be finalized as proposed, this exemption would become moot and many credit unions may have to discontinue or decrease agricultural lending. In many rural markets there are a limited number of lending institutions and if credit union lending was significantly curtailed, it may be harmful to farmers and rural America. Thus, we urge you to take serious consideration of rural America and America's farmers before finalizing this rule.

Sincerely,

North Dakota Rural and Agricultural Organizations



Kim Swenson
President



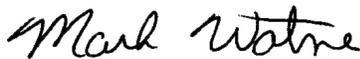
North Dakota Corn Growers Association
1411 32nd Street S Suite #2
Fargo, ND 58103



Peter F. Hanebutt
Director of Public Policy



North Dakota Farm Bureau
4900 Ottawa Street
Bismarck, ND 58503



Mark Watne
President



North Dakota Farmers Union
PO Box 2136
Jamestown ND 58402



Paul Rutherford
President



Red River Valley Sugarbeet Growers Association
1401 32nd Street SW
Fargo, ND 58103



Roger Johnson
President



National Farmers Union
20 F Street NW Ste 300
Washington, DC 20001