WFTFCU

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May 22, 2014

Mr. Gerard Poliquin
Secretary of the Board
NCUA

Dear Mr. Poliquin:

I would like to express my concerns regarding NCUA's proposed Risk-Based Capital rule. First let me say, I am NOT for the new proposal and I would sincerely hope that NCUA takes a step back and seriously re-evaluates the proposal before approving this regulation. Under the new proposed regulation, our credit union would still be considered well-capitalized, so at this time we would not be affected; but at some point in the future we could be. The strength, safety, and soundness of the credit union industry could be negatively impacted by this current proposal. I'm listing only a few concerns in this letter.

Credit unions would have to meet both the 7% net worth standard and the 10.5% RBC. If you meet one standard but not the other, which standard is considered primary? What PCA action would take place? The risk weighting for mortgage loans and MBLs is strictly concentration based; there is no factoring for LTV, credit rating, or credit performance. There is also no distinction between consumer loans with collateral and unsecured consumer loans.

NCUA also needs to address the fact that an individual examiner has the discretion to increase the risk-based capital requirement for a credit union based upon the examiner's subjective analysis. I would request that NCUA would consider removing the subjective examiner discretion entirely from the proposal. The 18 month implementation time table does not allow sufficient time for credit unions to make necessary adjustments to their balance sheet. I would also request that NCUA would consider a 36 month implementation date instead.

I respectfully and strongly encourage you to consider possible improvements to the RBC rule before it becomes regulation.

Sincerely,

Angela Clark

Angela Clark
President/CEO