



22 May 2014

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

RE: Comments on Proposed Rule: PCA -- Risk-Based Capital

Dear Mr. Poliquin,

I am the Financial Manager for the City of Novato. I also serve on the Board of Community First Credit Union, which has assets of \$170 million and more than 16,000 Members in the North SF Bay area.

If your goal is to shut off lending to Members then this proposal should be very effective. We are already actively discussing how we will need to modify our successful lending programs under the proposed capital requirements.

Each year, we pump millions of dollars of stimulus into the local economy by providing loans to local residents. We make loans by taking smart, educated, time-tested, analytical risks. Moreover, we can only remain sustainable by taking these risks -- especially in the near zero-rate environment in which we've been operating for the past six years.

By eliminating risk, your proposal puts at risk our ability to fully function and take away our *raison d' être*.

It's time to start treating those of us who manage, govern and supervise credit unions as adults.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian Cochran".

Brian Cochran
Vice Chair, Board of Directors
Community First Credit Union

Here For Good.