

From: [Carla Daniel-Kelley](#)
To: [Regulatory Comments](#)
Subject: PCA-Risk Based Capital
Date: Friday, May 23, 2014 10:49:27 AM



May 23, 2014

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

Sent via email to: regcomments@ncua.gov

RE: AFECU comments on proposed ruling: PCA-Risk Based Capital

Dear Mr. Poliquin:

As a small credit union with \$22M in assets and 2296 members, I am writing to you to express the concern that we have with the proposed rule. At this time it will not directly affect the day to day operations of our credit union but we feel like credit unions must stand united, big or small.

We understand the need for NCUA to explore and implement a rule that is in line with the banking industry however NCUA must also remember that credit unions are in a league of our own and in no way comparable to the banking industry. Yes we offer the same types of products and services but we are and have always represented our membership, we offer services to enhance our member's financial stability not to pad the pockets of stockholders who benefit from higher rates and exorbitant fees. Most banks are no longer interested in the consumer lending side of the business they are in it for the million dollar commercial loans. Credit unions are there for their members for all lending and investing needs for the betterment of their lives.

Unnecessary regulatory burdens are becoming the demise of smaller credit unions that have limited

In conclusion, AFECU ask that NCUA consider the impact that this regulation will truly have on the credit union industry as a whole. An industry that is there for

Sincerely,

Carla Daniel-Kelley

Carla Daniel-Kelley

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