



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 a Board Member in a very dynamic county: Sonoma, California. It has the third highest concentration of sole proprietorships, free-lancers and consultants in the nation. It is also very tech savvy, with early adoption of electronic banking services.

Additionally, we are the epicenter for the California Wine industry.

This unique set of business circumstances means that Community First Credit Union, the Board with which I serve, offers a variety of carefully crafted unique loan products. For example, we offer portfolio mortgage loans on 10+ acres with agricultural income (i.e. wine grapes), or manufactured housing (on foundations) in rural locations, or unfinished second units (for wine workers or extended families). These unique loans, crafted for our unique location and unique local businesses perform exceedingly well.

Your proposed one-size-fits-all rule change would cut us off at the knees. It would eliminate the biggest advantage we have over the big national banks.

We sincerely ask that you re-think this proposal and kill it, before its unintended consequences kill us and other credit unions.

Sincerely,

A handwritten signature in blue ink that reads "Jean Neff". The signature is fluid and cursive, with the first name "Jean" and the last name "Neff" clearly visible.

Jean Neff  
Board of Directors  
Community First Credit Union

*Here For Good.*