

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,

As I understand the proposal we can pass both capital tests, with flying colors, but through your "subjective judgment" and "agency expertise" you can tell us we are still not performing to standards! Incredible!

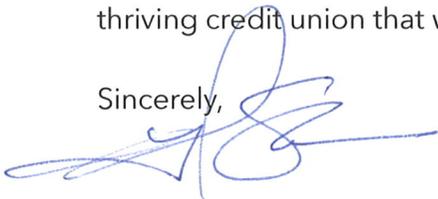
I am a Board Member with Community First Credit Union in Santa Rosa, Calif. Our four executives have a combined century of experience in leading financial institutions through good and bad markets, and through increasing and decreasing interest-rate environments. They have been successful everywhere they've been.

Our real estate team, 10 people, has 223 years of LOCAL, hands-on, mortgage experience among them. That's 22.3 years each, on average. They, too, have been successful wherever they have been.

Can your agency expertise compare with that level of expertise -- in our unique market, against the local competitors we know well, in this sub-regional economy where we live, breathe, work and play? Really?

Your subjectivity scares me. I've seen it in some of your examiners' recommendations before. And had we followed their recommendations, we wouldn't be the functioning, thriving credit union that we are today.

Sincerely,



Tom Scott  
Board of Directors  
Community First Credit Union

*Here For Good.*