

May 22, 2014

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

RE. Risk Based Capital Proposal

Dear Secretary of the Board Poliquin,

I am writing to the National Credit Union Administration (NCUA) to address my concerns about the proposed Prompt Correction Action Risk-Based Capital regulation. I am a credit union volunteer board member representing over 188,000 members. I have proudly served my credit union and have worked hard to try and make a difference in the lives of our members, following our guiding principle of "Bringing people together to improve their quality of life." However, this has become extremely difficult for our credit union during these times of razor thin margins!

Our president and chief executive officer has sent his letter to the NCUA board addressing in detail the numerous short falls this proposal currently has in it. The portion of the proposal that bothers me the most is the impact on our members and the future of the credit union movement itself. Our ability to grow through expanded member services, technological advances, new markets and locations and competitive positioning will be directly and negatively impacted due to these proposed regulations.

At a time when credit unions have been helping their members in these tough economic times, these regulations will impede our credit union's ability to be competitive in the market place in providing safe and sound financial member services. Loan products impacted include: member/consumer lending, mortgage lending and the use of our collaborative CUSO. Savings products impacted include: reduced dividends on members shares and CD's. In short all of our member service products will be negatively impacted!

While we understand the need for adequate risk based capital requirements, we also see a need for such a program to be fair and balanced. Our industry, with very few exceptions, has performed remarkably well during this economic downturn. We have seen our membership grow and our services grow. I fear if these proposed regulations are enacted, we will see membership begin to decline because of an inability to compete in the open market. I just do not see the need for such an onerous set of regulations!

I urge the NCUA board to extend the comment period and to chair a series of meetings with our credit unions' leadership to work through this attempt to enhance our movement to BETTER serve our members!

Respectfully,

Wayne E. Foshay  
Chairman of the Board  
Chartway Federal Credit Union

Copy to:  
Senator Mark Warner  
Senator Timothy Kaine  
Congressman Scott Rigell