



May 27, 2014

Mr. Gerard Poliquin
Secretary, NCUA Board
1775 Duke Street
Alexandria, VA 22314-3428

**REF: Risk-Based Capital: Commenting on Your Future –
Part 12: A CALL FOR LEGISLATIVE ACTION**

Dear Mr. Poliquin:

“We hold these truths to be self-evident...”

The broad range of fundamental flaws in the proposed risk-based capital (RBC) rule implies a state of policy-making in severe disarray, at the National Credit Union Administration.

The 100 million citizens who own America’s credit unions require, expect, and deserve sound, prudential reasoning and thoughtful judgment in the determination of capital levels and risk measurement **at their local credit unions.**

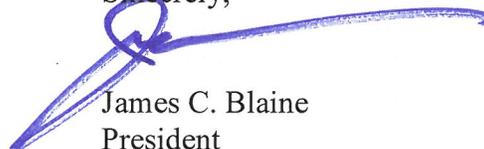
That sound reasoning, that thoughtful judgment are sorely lacking in NCUA’s proposed RBC rule – **that is clearly self-evident.**

At this juncture, the only safe course for determining the future capital structure of credit unions is to ask for a public dialogue through Congressional legislation.

Direct action by our elected representatives on this critically important issue should be an **“unalienable right”** for all credit union members.

It should also help assure their **“... Life, Liberty, and pursuit of Happiness”**.

Sincerely,



James C. Blaine
President

JCB/ji