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May 20, 2014

Mr. Gerald Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-342

8E: Comment to Proposed Corrective Action: Risk Based Capital Rule
8IN 3133-AD77

Dear Mr. Poliquin:

I appreciate the opportunity to comment on the proposed Risk Based Capital Rule. I am writing this letter as a long time employee of Central City Credit Union, which serves members in Central Wisconsin. Our current membership base is over 23,000 members with assets just over \$210 million. I understand the importance of risk analysis and the importance of a strong capital position but I feel there are many flaws in the proposed rule.

I am concerned about the negative effect this proposal will have on our ability to serve our members needs. Specifically our member's in need of a home loan. We have worked very hard to develop a strong mortgage portfolio while offering products that will best suit our member's needs. It seems this rule will impose higher capital requirements on our credit union, jeopardizing our ability to continue offering our mortgage and commercial products putting us at a competitive disadvantage in order to maintain well capitalized status. Members will see less value from their credit unions, if we have to impose higher fees, pay lower dividend rates, offer fewer service options, charge higher costs for these services, and have limited opportunity to serve the under-served.

This proposal will give examiners the additional authority to impose even higher capital requirements on individual credit unions that could exceed the well capitalized level. Basing capital requirements on examiners discretion leaves much uncertainty for credit unions as opinions will vary from year to year depending on the examiner.

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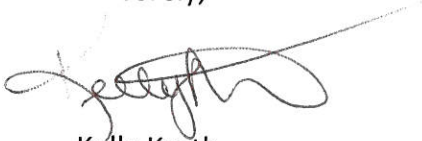
I have concerns regarding the proposed timeline of eighteen months. This does not seem to be enough time to change strategic plans and restructure balance sheets. I feel that phasing this in over time would be a better option.

I feel that the credit union industry has remained strong during our recent economic recession and has shown financial strength, resiliency and proven they had sufficient capital. History has shown credit unions weather the storm much better than banks, yet we are potentially being held to stricter rules.

I believe the removal of the NSUSIF deposit from the numerator is a detriment to the capital calculations and results in a ratio reduction that is not necessary. Because credit unions cannot raise additional capital this is an issue.

I appreciate the opportunity to comment on this proposed regulation. I hope my concerns as well as the other credit union professionals will be considered. Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kelly Korth', with a long, sweeping horizontal line extending to the right.

Kelly Korth
SVP Sales and Service
Central City Credit Union