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May 21, 2014

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

Dear Mr. Poliquin:

On behalf of over 21,000 members of Beehive Federal Credit Union (BFCU) I appreciate the opportunity to comment on the National Credit Union Administration's (NCUA) proposed rule, Prompt Corrective Action - Risk-Based Capital. BFCU serves members of the Church of Jesus Christ of Latter-Day Saints in Idaho and contiguous states.

I have come to work every day for the past 29 years as the CEO of Beehive Federal Credit Union (BFCU) with two purposes in mind:

1. Deliver high quality, affordable financial services to our members in a pleasant and professional manner.
2. Sustain the financial viability of BFCU.

BFCU has operated successfully under the current capital standards, even during the most intense recession of my lifetime. In fact, throughout my 29 years as CEO we have always maintained a capital ratio well in excess of NCUA's standard for being well capitalized. Under current capital standards our local board and management has successfully managed BFCU's operations in the best interest of our local members while providing very little risk to NCUSIF. While I respect NCUA's role, I believe that we are better able to make decisions that will result in BFCU's financial success and better service our members than a regulator who cannot understand the specific needs and personality of our membership.

In my opinion, there is not a need to create stricter capital standards. Credit unions are held to the highest capital standard of any financial institution though they cause the lowest risk to the taxpayer. Credit unions have had the lowest default/delinquency rates in almost every category of loans and have maintained net worth ratios well in excess of those held by banks. The already strict capital standards are more than sufficient to ensure long term viability of the credit union movement. In summary, please do not burden BFCU and our members with more unnecessary regulatory burdens. Allow us to focus on our members and take reasonable risks to accomplish the purposes outlined above. Thank you for the opportunity to comment on this proposed rule and for considering our views on risk based capital requirements.

Sincerely,

A handwritten signature in black ink that reads "Shane Berger".

Shane Berger
President/CEO

SB:ja