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Submitted to: regcomments@ncua.gov

Gerard Poliquin,
NCUA, Secretary of the Board
1775 Duke St
Alexandria, VA 22314

RE: RIN3133-AD77

Dear Mr. Poliquin,

I am very concerned with the proposal for the new Risk Based Capital Requirements for Credit Unions. I do understand the need to have a sufficient capital base as I have been in the Credit Union industry 29 years and seen the dramatic effects that economic cycles have had and the toll that has been taken on the Credit Union Share Insurance Fund and the industry as a whole.

That being said, I do not agree with the proposed rule nor the manner in which implementation is being indicated. The hill is too steep and the time is too short; unless the primary purpose is to shutter those "well capitalized" credit unions in the 7.50% range; which is effectively what this rule would do to us.

We have been subjected to an awful lot of random, short-sighted mis-steps by our regulators over the past 10 years and in our case suffered a $600k loss because our examiner deemed it a requirement to have Capital in "two" corporate credit unions. To give additional authority for examiners to individually determine the financial well-being of credit unions based on their particular slant or value of a service or product is just irresponsible.

Because an existing rule or standard has been in existence for 10 years does not mean that it's broken nor even in dis-repair. I would suggest that it is because the views of those looking at the rule just don't like what they see or perhaps don't have a more productive task at hand than changing what doesn't appear to need change.

Thank you for hearing my viewpoint.

Sincerely,

Robert E. Williamson
Manager of Information Services
IBEW & United Workers FCU