

May 28, 2014

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

RE: Express-News FCU comments on Proposed Rule: PCA-Risk-Based Capital

This letter is to comment on the views of the Express-News FCU regarding the NCUA's proposal on PCA-Risk Based Capital. The Express-News FCU is based in San Antonio, Texas and serves the local newspaper and we have 1,301 members.

As I understand it the drafted proposal increases the regulatory burdens of all credit unions, even those under \$50 million in assets. This proposal which estimates the time burden of each credit union to collect risk-based capital ratio data at over 160 hours of work. For a small credit union that is very hard to do. I feel like I already spend too much time on regulatory information now. This is time away from helping my members. If my credit union will not be considered "Complex" why would I need to spend the time getting this information together?

I feel like credit unions under \$50 million in assets should be exempt from this proposed rule all together. If that is not possible then credit unions need additional time to comply beyond the proposed 18 months.

Sincerely,

Linda Tudyk
Express-News FCU
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