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P.O. Box 3261  
Shreveport, LA 71133  
318.798.4061  
800.222.4024  
[fax] 318.795.2719

May 19, 2014

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

RE: Comments on Proposed Rule: PCA - Risk-Based Capital

Dear Mr. Poliquin:

I am President/CEO of Shreveport Federal Credit Union. My Board of Directors, Management and I do not agree with the proposed risk based capital rule.

The proposed rule takes quite a step forward in several areas by increasing NCUA authority to impose additional capital requirements on credit unions based on the subjective opinion of the examiner.

We are a credit union that serves the Delta of Mississippi...largely rural, small crop farmers who have never had the luxury of building a strong credit profile. We are concerned that any additional Net Worth constraints will significantly hamper our ability to provide access to credit to these rural farmers and families.

In addition, we are concerned that allowing examiners to randomly judge the quality of our portfolio and to determine subjectively that we should be required to hold more capital than otherwise would be required, is a deterrent to our board's desire to serve the underserved, underbanked and the unbanked.

We believe that capital requirements should not be a substitute for proper credit union management or appropriate examinations.

NCUA has tools to assess interest rate risk, liquidity risk, credit risk and concentration risk without trying to load these risks onto a one-size-fits-all computation.

NCUA provided a calculator for credit unions to see how the rule would affect them based on most recent call report data. According to this calculation, our credit union would continue to be 'well capitalized'. Nevertheless, we are greatly concerned that our ability to manage our balance sheet will be hampered by this rule.

We are asking you to reconsider adoption of this rule.

Sincerely,

*Helen Godfrey Smith*

Mrs. Helen Godfrey Smith, President/CEO  
Shreveport Federal Credit Union

*Birdex Copeland*

Dr. Birdex Copeland, Chairman  
Shreveport Federal Credit Union