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| **From:** | Joetta Heck |
| **To:** | _Regulatory Comments |
| **Subject:** | Prompt Corrective Action Risk-Based Capital Comment Letter |
| **Date:** | Wednesday, May 28, 2014 9:51:36 AM |

Dear Secretary of the Board Poliquin,

I am writing on behalf of KEMBA Charleston FCU, which serves members of modest means that work in the Kroger Grocery Stores and in an underserved area in the Dunbar WV area. We have just under 5,900 Members and just over $40 milliion dollars in assets. KEMBA appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

Our credit union, although not currently under the new rules threshhold, would reach the 50 Million in Assets within a short time. We are currently well capitalized at just under 20% and we do not have a complicated credit union structer. We have chosen to date to refrane from products such as loan participations and business lending. However, we reserve the right to do so in the future to help us better serve our membership. This rule could hamper that ability and limit services to our members in the future.

We do not believe that the proposal is necessary. Credit Unions just came through a tough storm and weathered it fairly well. A storm that we did not create I may add.

Although I realilze that it is the purpose of NCUA to make sure that the Credit Union System remains stable...I believe this can be done on a case by case basis and that it should not give the flexibility to the examiners that this rule will.

I believe that the risk weightings for the following areas should also be based on the credit union and the way they run their programs. Not all of these programs are harmfull when managed well:

- MBLs
- Mortgage Loans
- Longer-term investments
- Consumer loans
- CUSOs Investments and Loans

The NCSUIF deposit should also be included in the calculation of RBC ratios. I see no reason to exclude these funds?

I beleive that the proposal should be studied more considering the negative impact that it could have on many more credit unions than we have estimated. We also would like to see less power in this going to individual examiners. We already see vast differences between exams.

We would propose that you study it longer for long term effects and phase the final in very carefully so that we can all be strong to serve our members for many years into the future.

Thank you for the opportunity to comment on this proposed rule and for considering our views on risk based capital requirements.

Sincerely,

Joetta S Heck, CCUE/CUCE
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