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May 28, 2014

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

Subject: Comments on Proposed Rule PCA-Risk Based capital

Dear Mr. Poliquin:

On behalf of the members of Heartland Credit Union, I want to thank you for allowing me to express my opinion of the proposed rule change. Although I understand the NCUA's position and the need for all credit unions to maintain a healthy net worth position relative to its risk level, there are some areas of the rule that concern me.

Although Heartland Credit Union is a fairly conservative credit union in regards to investments and lending, I am concerned how these changes could affect it. My main areas of concern revolve around the ability of NCUA to impose a higher capital requirement that is based on one auditor's opinion. I also have concerns regarding the short implementation period of 18 months.

Although continued focus on the strength and sustainability of the share insurance fund is critical, I fear these changes could have a negative affect on the credit union industry and the ability of Heartland Credit Union to serve its membership.

Thank you for this opportunity and please feel free to contact me with any questions.

Sincerely,

Thomas P. Lex  
President/CEO