

May 28, 2014

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

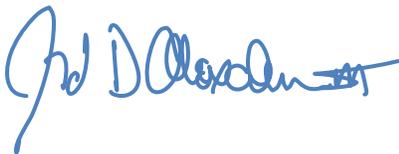
RE: Comments on NCUA Proposed Rule: Prompt Corrective Action—Risk-Based Capital

Dear Mr. Poliquin,

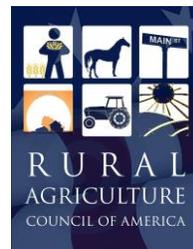
This letter is on behalf of the rural and agricultural organizations listed on this letter. We are writing to you to express our concerns regarding the impact the NCUA's proposed Risk Based Capital rule could have on rural areas and the potential impact on America's farmers. Credit unions have served rural America for years by making safe and affordable agricultural related loans. It is because of this history of safe and sound loans that Congress created an exemption for rural based credit unions so that they would not be subject to the 12.25% cap on business lending. If the rule were to be finalized as proposed, this exemption would become moot and many credit unions may have to discontinue or decrease agricultural lending. In many rural markets there are a limited number of lending institutions and if credit union lending was significantly curtailed, it may be harmful to farmers and rural America. Thus, we urge you to take serious consideration of rural America and America's farmers before finalizing this rule.

Sincerely,

Concerned Rural and Agricultural Associations



Jack Alexander
President & Chairman
Rural & Agriculture Council of America (RACA)
653 Constitution Ave NE
Washington, DC 20002

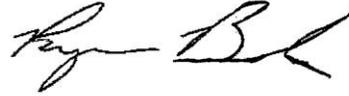


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