

April 16, 2015

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

RE: Comments on Proposed Rule: Risk-Based Capital; RIN 3133-AD77

Dear Gerald Poliquin,

I am a volunteer director of Heartland Credit Union, which serves some 21,000 members in Madison and Southwestern Wisconsin and has \$225 million in assets. Heartland Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the Risk Based Capital Rule. In addition, I have devoted much of my career to the credit union movement because I feel so strongly that credit unions can make a difference, precisely because they are different.

As you know, today's credit unions have their roots in 19th Century Europe where desperate times led Hermann Schulze-Delitzsch and Friedrich Wilhelm Raiffeisen to form the first credit cooperatives. Small farmers, in particular, benefited because although they were allowed to own their own land for the first time, few had means to buy and farm the land. Their only source of credit was moneylenders who charged outrageous interest rates and foreclosed indiscriminately, if payments could not be met. Credit societies -- credit unions -- helped change all of that.

At Heartland Credit Union, we have a strong agricultural lending portfolio. We are proud to continue the tradition of helping farmers because prior to being able to access credit from us, farmers were at the mercy of the bankers. We feel good about providing these ag loans -- member business loans -- because not only do they perform, but also serve a fundamental credit union purpose: credit for provident and productive purposes. We are concerned about the effect the Risk-Based Capital Rule the NCUA Board is considering will have on our ability to make these loans. We urge you to remember why credit unions were formed in the first place and not cause the unintended consequences of increasing costs to members and adding burdensome regulations that appear to be a solution in search of a problem.

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

Sincerely,

Lucy Harr
Director
Heartland CU

cc: CUNA, CCUL