

April 17, 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,

Dear Gerald Poliquin,

I am writing on behalf of Unison Credit Union. We have over 17,000 members and 185 million in assets. Unison appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the Risk Based Capital Rule.

Although Congress has stated NCUA must develop risk based capital standards and they must be formulated in a similar fashion as the banking industry, we do not believe Congress wished to create a tax on our members and abandon the cooperative principles of credit unions. Recently NAFCU published an estimate that credit unions will need to raise an additional \$760 million dollars in capital to achieve their current capital levels. Because credit unions only have one source of earnings, that additional capital tax will come from our members in the form of higher rates on loans and lower rates on savings. We believe NCUA's estimate falls far short of the actual cost to the industry and again focused on the potential risk to the insurance fund rather than those they regulate and ultimately their members . In an effort to remain the best financial resource for our members, we would encourage the NCUA to withdraw the proposed rule altogether. In the event you choose not to withdraw the rule it should at the very least be pushed back until we can define a rule that is not unduly burdensome on credit unions of all sizes.

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

Sincerely,

Mark Hietpas
President/CEO
Unison CU

cc: CUNA, CCUL