

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 791 and IRPS 15-1

Dear Gerald Poliquin,

I am writing on behalf of Technicolor Federal Credit Union, which serves employees of the entertainment industry. We have about 4,500 Members and \$46 million assets. Technicolor FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the small entity definition.

We wholeheartedly support the proposal that would amend NCUA's definition of small entity for Regulatory Flexibility Act analysis and obtaining OSCUI services by increasing the asset threshold from \$50 million to \$100 million. However, we also support an expanded threshold to be increased to upwards of \$550 million to be at par with the FDIC Regulatory Flexibility Act.

Our credit union is growing at a rapid pace and are entertaining a series of planned mergers that could make our credit union's asset size increase to over \$200 million within 5 years. We wish to achieve this grand objective to reduce our expenses through economies of scale, expand our market reach and increase our competitiveness by deploying new delivery channels, enhanced technology and better member service. Small credit unions fall short in all of these areas and growth is the only solution. However, increased regulation as a reward (or really a punishment) for growth only hinders our ability to grow.

We will be grateful for any regulatory relief, but implore you to consider a threshold beyond \$100 million so that all credit unions, which make up about 1/17th of the marketshare of the banking industry, have a chance to compete on a level playing field. Additionally, if you approve a higher threshold, we won't have to have a second comment period years down the road when we have to increase the threshold from \$100m to \$250m or \$500m. I'm just saying, I think it might be much more efficient to do so that way.

I submit this letter with great respect and admiration for Ms. Matz and the board of NCUA and I truly thank you for your consideration.

Sincerely,

Robert Baron  
Vice President | Marketing  
Technicolor FCU

cc: CUNA, CCUL