



RELIANT

FEDERAL CREDIT UNION

Filed via regcomments@ncua.gov

April 17, 2015

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

RE: NCUAs Risk Based Capital Proposal, RIN 3133-AD77

Dear Mr. Poliquin

I appreciate the opportunity to give comments relative to NCUAs second proposal for Risk Based Capital (RBC2).

Though improvements have been made to the first proposal, this continues to be a solution in search of a problem. We've just been through the worst economic downturn in nearly a hundred years and the credit union movement survived better than other financial institutions. Why are you trying so hard to treat us like them? I don't believe you have demonstrated a need for these changes.

I don't believe you have the legal authority to attach risk based capital requirements to anything other than the classification for adequately capitalized. I know that a number of members of the United States Congress have written you specifically regarding their view that you lack the authority to make this change. In this regard, nothing has changed from your original RBC proposal.

The new definition of a complex credit union is simple to calculate but does not adequately consider anything other than asset size. I fear large non-complex credit unions will be forced to comply with the burdens of this new regulation without being truly complex. What is the purpose of adding this burden unnecessarily?

I believe any change to RBC requirements should be accompanied by changes to supplemental capital. You want to treat us like banks for RBC yet we don't have the same access to capital. This is ignorant of the differences between credit unions and all other financial institutions

If you truly want to help credit unions, then give us back the excess TCCUSF dollars taken but now not needed. Getting our money back will help, this additional regulation will not.

Sincerely,

Steve Higginson
CEO