

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,

I am writing on behalf of Ussco Johnstown FCU, which serves Selected Employee Groups in the South Western Central PA area. We have 12,500 Members and 101,000,000 in assets. USSCO Johnstown FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the Risk Based Capital Rule.

We challenge the need for RBC2 noting that credit unions survived the recession of 2009 under the current capital scheme and prompt corrective action. The ruling is not needed with the current Capital levels and with the strength of the industry. Too much regulation is not good for the movement. If anything, there needs to be a reduction in the complexity of the regulations that drive the industry.

We appreciate that the risk weights that have been reduced. However, this scheme remains overly complex. The treatment of first mortgages and junior liens is out of proportion to their risk profile. The rule should arrive at a risk weight for these assets by including a study of loss history and the market where a credit union operates. Pennsylvania has not experienced volatile adjustments in the value of real estate. The same apply with member business loans.

Please consider the industry when putting this in place. We understand that capital remains king but let us manage our individual Credit Unions in a rising rate environment and let us make money to enhance the capital ratio's instead of changing a regulation that is working for the industry..

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

Sincerely,

Todd Cover
Chief Executive Officer
USSCO Johnstown FCU

cc: CUNA, CCUL