

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 Printing Office Employees Credit Union, which serves printers, publishers and related trades in Southern California. We are small, with 800 Members and \$4.2MM in assets. Thank you for the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the Risk Based Capital Rule.

As this proposed rule will not immediately affect POEcu, I have not given it the attention or study that I otherwise would. Therefore my comments will be extremely brief. What I have read and researched has led me to the following: Why has so much time and energy been spent on a new rule that is completely unnecessary and would impose additional restrictions on an industry that is doing a very good job? If you recall, Credit Unions did much better than banks during our recent (and ongoing?) recession. We emerged as the "good guys" and though we took some hits with Wescorp, et al, we paid for the damage and took care of ourselves. As we moved into this new era of historically low interest rates, we found new ways to serve our members and remain profitable. At a time when other industries are struggling or failing Credit Unions continue to succeed. Why would you want to put any kind of restriction in the way of an industry that is doing so well? Please, let's dump RBC2.

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

Sincerely,

Thomas Farrar  
Chief Executive Officer  
Printing Office ECU

cc: CUNA, CCUL