

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 Big Island FCU and our Member's, which serves The Island of Hawaii. We have 8900 Members and \$83M in assets. Big Island FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the Risk Based Capital Rule.

It is my opinion that the new regulation is not necessary. The burden of making sure the Credit Union is in adequate position should be on the Credit Union Management, The Board of Directors and our Examiners. Even if more capital is required in most cases the credit union that failed would have still failed. The small Credit Union (I believe that should be at \$100M) do not pose a threat to the financial stability of the share fund and the financial sector. I do believe that large Credit Union should have a more extensive exam as well as the Corporate.

NCUA continues to say Nationally that the Credit Unions are to make good solid loans but then takes that the responsibility away from the Credit Unions. The examiners do not have a great track record prior to the Recession of know what is best for our members so let Management decide, especially on making mortgage loans.

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

Sincerely,

Terry Gresswell
CEO
Big Island FCU

cc: CUNA, CCUL