



April 20, 2015

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

**Via e-mail:** [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

**Via fax:** 703-518-6319

**Re:** Comments on Proposed Rule: Risk Based Capital, 12 CFR Parts 701, 702, 703, 713, 723 and 747

Dear Mr. Poliquin:

Thank for your consideration regarding our formal comments from Point Breeze Credit Union on the National Credit Union Administration's ("NCUA") recent proposed rule, Risk-Based Capital ("Proposed Rule") issued on January 15, 2015.

Point Breeze Credit Union has over 50,000 members and total assets of \$735 million. We believe the Proposed Rule is not necessary for our industry, as we did not create the Great Recession nor will we in the future.

Additionally, if the rule is adopted, it will unnecessarily siphon capital and liquidity that could be used to help us to continue to recover from the recession; which is not over. **Please note that even though the rule doesn't apply for years, many credit unions will start "saving" today to meet the future requirements that are unnecessary.**

Given the fragile nature of the current economy, we couldn't have picked a worse time to install such a drastic measure.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bernard G. McLaughlin", is written over a light-colored background.

Bernard G. McLaughlin  
President/CEO  
Point Breeze Credit Union  
11104 McCormick Road  
Hunt Valley, MD 21031

**Hunt Valley Office**  
11104 McCormick Road  
Hunt Valley, MD 21031

**Rosedale Office**  
2 Philadelphia Court  
Baltimore, MD 21237

**Bel Air Office**  
410 South Atwood Road  
Bel Air, MD 21014

**410.584.7228**  
**888.233.7228**  
**pbcu.com**