

April 20, 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 have a PROBLEM and really need NCUA's help. I am a board member of Chartway Federal Credit Union and if RBC2 is put in place as proposed addressing 'Goodwill' my credit union will be changed forever. As a volunteer board member within ten years I possibly will need to explain to the membership why our credit union may not be competitive in the market place.

Several years ago Chartway worked with NCUA on supervised mergers of three failing credit unions. When these proposed mergers were presented to our Board, we did our due diligence based on current NCUA regulations and Generally Accepted Accounting Principles to include Goodwill accounting. This evaluation indicated the mergers could safely be incorporate without adverse impact on Chartway. The end result was it provided continue service for the three failed credit union members, saved the NCUSIF from a significant loss and now my credit union is in potential trouble.

I am asking NCUA to please grandfather a onetime permanent exemption of Chartway's Goodwill acquired under supervised NCUA guidance in perpetuity. This onetime exemption should only affect credit union's that have been in compliance with NCUA guidance with supervised mergers. NCUA's positive action should not adversely affect the NCUSIF and Chartway's board members will not have to explain to the members why things could be changing not for the best at Chartway Federal Credit Union.

I personally feel any proposed new regulation that adversely affects even one well managed credit union is not a good regulation.

Thank you for the opportunity to comment on this very critical issue regarding this new proposal and my credit union. Living in a country where a person can express their concerns and thoughts to their

government is why I was proud to have honorably served in our U.S. Navy.

I am looking forward to your response and hopeful NCUA will make the suggested adjustments.

Copy to:

Congressman B. Scott

Congressman E. Scott Rigell

Senator Mark Warner

Senator Tim Kaine

Sincerely,

Everett Gull
Board Secretary
Chartway FCU

cc: CUNA, CCUL