



Filed via regcomments@ncua.gov
April 20, 2015

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

RE: Infinity FCU-Comments on Proposed Rule: PCA-Risk-Based Capital

Dear Mr. Poliquin:

On behalf of Infinity Federal Credit Union in Westbrook, Maine, I am writing in response to the National Credit Union Administration's proposed risk-based capital regulation and appreciate the opportunity to share my comments.

During the economic crisis, the credit union industry fared well and the share insurance fund was replenished without this rule, proving our cooperative model a successful one. In our opinion, the complexity of each credit union should continue to be reviewed in the exam process only based on the individual credit union unique attributes; the complexity of the products and services provided to our membership. I respectfully ask that you discard this rule and you continue to let each credit union determine how much capital is appropriate based on their strategic direction and the local factors that impact them on a regular basis. Implementing a one size fits all capital formula undermines the credit unions cooperative nature and may result in backing away from our mission to provide affordable products and work with each member to manage risk.

Again, thank you for your consideration and the opportunity to comment.

Thank you,

Sandra Cloutier
COO, Infinity Federal Credit Union

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