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Public Comments on Risk-Based Capital: =====

Title: Risk-Based Capital
FR Document Number: 2015-00947
RIN: 3133-AD77
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Comment: April 27th, 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,

On behalf of Houston Highway Credit Union, I am writing to you regarding the NCUAs proposed rule governing risk-based capital. HHCU appreciates the opportunity to provide comments on this highly important regulatory proposal.

I am the President of a \$62 million, community based credit union with a background spent as an examiner prior to joining this unique industry. My experience presents me with the understanding and urge to regulate the current risk-based capital proposal. Servicing a community, such as the distinctive Greater Heights of Houston, has taught me that assessing risk needs more strategy and involvement than any outside individual can impose. The same goes for determining asset size. One cannot choose to speculate the identity of complexity on asset size alone. Implementing a one size fits all method is a disservice to what HHCU, and every credit union brings to the financial service industry. Deposit account types, member services, loan and investment types, and portfolio composition are different variables that make a credit union complex.

When creating a strategic profile, objectives differentiate tremendously depending on vision, proficiency, and of course the volunteers involved. When discussing capital adequacy, deeming a credit unions capital cant be as black and white as the NCUA is proposing and definitely not subjected to examination and supervision. We have to be measured in shades of gray or the whole belief of why we exist is nullified. Our volunteers are strongly rooted in our community and being managed by a local team is ideal, rather than a distant mind that approaches with a unanimous concept.

We thank you for the opportunity to highlight our concerns. As a credit union, we have an obligation to best serve our members. We strongly urge the NCUA to reconsider the current risk-based capital proposal.

Sincerely,

Craig Atkinson
President
Houston Highway CU

Cc: CUNA, CCUL

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