

COMMONWEALTH UTILITIES EMPLOYEES  
CREDIT UNION

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Filed via [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

April 27, 2015

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

Re: NCUA's Risk Based Capital Proposal  
RIN 3133-AD77

Dear Secretary Poliquin:

Commonwealth Utilities Employees Credit Union greatly appreciates the opportunity to submit a comment to the National Credit Union Administration (NCUA) Board's request for comments on the NCUA's second proposed-risk based capital rule (RBC2). Commonwealth Utilities Employees Credit Union is a Federally Insured State Chartered Credit Union with assets totaling \$42,475,868, representing approximately 2,250 members.

RBC2 does represent an improvement over the original proposal NCUA issued last year and we are pleased that the NCUA considered the thousands of comments from the industry and opened the door to further adjustments to the proposed rule. We believe that further consideration of instituting a Risk Based Capital RBC) Rule is not in the best interest of credit unions and serious discussions should be held to discuss the intent and desired outcome of such a rule.

As a small credit union looking for ways to grow while managing Interest Rate Risk, Liquidity Risk and adequate Capital, we believe we currently have the tools necessary to achieve our goals. Assigning risk weights to CUSO Investments, the ALLL Account and any consideration given to parity with Banks will change who we are, how we serve our members and create chaos in an industry that has survived extremely well for over 100 years. We believe that this rule will curtail planned strategies and force us to re-consider the future of small credit unions. We are firm in our belief that all credit unions should continue to exist and fulfill their original charter with a well-planned, thought out strategy.

Thank you for your consideration of our view on this proposal.

Sincerely,



Catherine Diamon  
Chief Executive Officer