

April 27, 2015

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

**Re: Commentary on NCUA Proposed Prompt Corrective Action—Risk-Based Capital Rules**

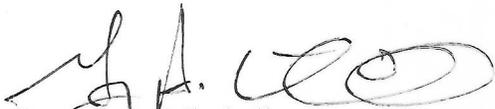
Dear Secretary Poliquin:

First Technology Federal Credit Union (“First Tech” or “Credit Union”) respectfully submits this response to the National Credit Union Administration’s (“NCUA”) proposed regulations entitled “Prompt Corrective Action – Risk Based Capital.”

We applaud the NCUA’s ongoing efforts to address long standing weaknesses in the capital regulations and believe the amended risk-based capital rule addresses all concerns noted in our prior letter. In our opinion, the proposed rule strengthens credit unions of all sizes while also reigning in “high risk” activities that could lead to failures and a related burden to the insurance fund.

While we understand that others in the industry disagree with our views on the importance of risk-based capital rules, we stand in support of NCUA and the proposed rulemaking.

Respectfully submitted,



Gregory A. Mitchell  
President and Chief Executive Officer  
First Technology Federal Credit Union

Cc: Board of Directors  
Supervisory Committee

