

April 27, 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 the Board of Directors, Management and members of Money One Federal Credit Union, I am writing to you regarding the National Credit Union Administration's (NCUA) proposed rule governing risk-based capital (RBC). We appreciate the opportunity to express some of our concerns and offer some suggested improvements in the rule for your consideration as you move forward in the rulemaking process.

This proposal is an inappropriate use of credit union resources. Our capital will suffer a major hit if NCUA sets forth separate risk-based capital thresholds for well capitalized and adequately capitalized credit unions. This proposal would require us to hold more funds in additional reserves to achieve the same capital position we currently maintain. These additional funds could be put to better use to fund loans to consumers and small businesses, which will assist in our nation's economic recovery.

NCUA should take a credit union's actual portfolio of assets and liabilities into consideration when defining a "complex credit union," instead of using a random asset threshold of \$100 million. Credit unions may be similar in asset size, but are clearly different with regard to the products and services we offer, as well as our level of complexity. Defining credit unions by a random asset size could have damaging effects on the credit union industry as a whole, and has the potential to create a divide in the industry. NCUA's efforts to further divide the industry by asset size is contrary to the best interest of credit unions, and ultimately, of the National Credit Union Share Insurance Fund.

Money One holds ownership interest in six CUSOs. The proposed 150 percent risk for investments in CUSOs does not take into consideration the different types of services provided by a CUSO. This risk-weighting is inappropriate because it does not reflect the actual risk of investing in CUSOs. CUSO investment should be weighted at 100 percent.

The proposed rule does not include any changes that would allow credit unions to raise supplemental capital. Money One has experienced significant loan growth. Providing an option for eligible credit unions to raise supplemental capital will allow healthy credit unions like us to continue to manage asset growth, while effectively serving our members.

Thank you for the opportunity to comment on this proposed regulation and for considering our views on risk based capital requirements.

Respectfully,

Kendra Johnson

VP of Finance & Administration

Sincerely,

Kendra Johnson
VP-Finance/Administration
Money One FCU

cc: CUNA, CCUL