WestEdge
credit union
"solutions not excuses"

April 20, 2015

National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314 3428

To: NCUA Board

Subject: Risk Based Capital Comment

After the economic down turn and failure of many credit unions, NCUA has recovered. During the crisis, credit unions emerged better than other regulated financial institutions.

Many credit unions continue to struggle as a result of narrow margins in this sustained low interest rate environment. Should the credit union industry be charged with raising additional capital, it will come from one source, earnings. This in turn directly impacts those we serve through increased loan rates or fees and a decrease in dividends.

I do not believe a second layer of required capital should be implemented. Part 702 of the NCUA Rules that Prompt Corrective Action at 7% is well capitalized

Protection of insurance fund and mitigating risk to the fund appears to be a high priority for NCUA. I fail to see the need on such a grand scale and support raising the threshold to $250 million or greater.

NCUA's current authority was able to deal effectively with the past economic crisis and it is time for NCUA to consider the trickle down impact rulings make in the best interest of our members.

Respectfully,

Katie Zowada, CEO

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