

March 24, 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,

I am writing on behalf of C.R.C. Federal Credit Union, which serves employees of the California Department of Corrections in Southern California. We have 1,900 Members and 9 million in assets. C.R.C. FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the Risk Based Capital Rule.

Although we are pleased the agency has addresses some of the issues in the original Risk-Based Capital Rule, there is still room for improvement. Most notably:

- The RBC requirement for well-capitalized credit unions should be lowered to 8% which is what is considered adequately capitalized.

- Remove interest rate risk from the proposal.

- Allow the entire ALLL account to be included in RBC.

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

Sincerely,

Rosie Zarubick
CEO
C.R.C. FCU

cc: CUNA, CCUL