

March 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,

Dear NCUA Board members,

We are a \$166 million dollar credit union with over 25,000 members. We do a tremendous amount of good each and every day with innovative products and services designed to promote the financial well-being of our member/owners. We are not a bank and don't operate like a bank. We are a credit union and need our regulator to support our unique charge to protect and serve consumers in an often abusive financial services arena.

Many credit unions have unique strategies that are proven to work and deserve to continue doing the good work they do. The proposed risk-based capital (RBC) rule attempts to treat credit unions as banks, but alarmingly proposes to challenge credit unions with even more restrictive RBC regulation. Specifically, I have the following concerns:

1. The trigger to be a well-capitalized credit union was lowered from 10.5% to 10.0%. This still seems too high.
2. The concentration penalty for business loans and mortgages is still too high.
3. For some consumer loans the risk weights actually increase.
4. CUSOs are still overly penalized. CUSOs will be critical for non-interest income, but CUSOs have an effective risk weight of essentially 1.50.
5. The mortgage servicing rights risk weight remains at 2.50.

Without question, the proposed RBC rule guts the competitiveness of credit union lending and investments, adds substantial, unnecessary financial costs to credit union members, and attempts to rewrite federal law as it applies to credit union net worth statutes.

Most every credit union leader I speak with is a hard working, smart and capable professional who is committed to helping the people. We are the white hat

people, so please, we need your help. This RBC rule seems heavy handed and not in the best interest of the credit unions NCUA is entrusted to protect and serve.

Thanks for your consideration.

Sincerely,

Samuel Whitehurst
President/CEO
Summit CU

cc: CUNA, CCUL