

April 01, 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 United Health Credit Union, which serves healthcare workers and the community of Burlingame, CA. We have 5800 Members and \$65 million in assets. United Health CU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the Risk Based Capital Rule.

Simply put, I think this is one more thing that is creating complexity in the running of our credit unions. I see that it would create an influx of paperwork just to decide if a new product should be offered and the affect it would have under RBC. While we wouldn't have to comply, I am cautious to think it wouldn't trickle down over time to all credit unions. Is it presumed that credit unions over \$100m are complex? I would hate to think that one size fits all is the answer. This can be resolved during a Supervisory Exam based on an individual credit union's complexity.

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

Sincerely,

Linda White
CEO
United Health CU

cc: CUNA, CCUL