

April 03, 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,

Introductory paragraph:

I am writing on behalf of [your credit union name], which serves [your field of membership]. We have [number] Members and [dollar amount] in assets. [Your credit union name] appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the Risk Based Capital Rule.

Letter Body:

What specific products and services should the Board include in the list of products and services used to determine whether a credit union's portfolio of assets and liabilities is "complex," and why?

What number of complex products and services should a credit union be allowed to engage in before being designated as "complex," and why?

Is the new capital adequacy provision necessary?

Has NCUA justified the inclusion of this provision in the proposal?

If NCUA can be persuaded to remove it, should complex credit unions be subject to any additional capital planning requirements or guidance from NCUA?

If your credit union is chartered, do you foresee any issues regarding how NCUA would coordinate with state regulators on capital planning requirements?

Should additional supplemental forms of capital be included in the risk-based capital ratio numerator and how would including such capital protect the NCUSIF from losses?

If yes, to be included in the risk-based capital ratio numerator, what specific criteria should such additional forms of capital reasonably be required to meet to be consistent with GAAP and the FCUA, and why?

If certain forms of certificates of indebtedness were included in the risk-based capital ratio numerator, what specific criteria should such certificates reasonably be required to meet to be consistent with GAAP and the FCUA, and why?

In addition to amending NCUA's risk based capital regulations, what additional changes to NCUA's regulations would be required to count additional supplemental forms of capital in NCUA's risk-based capital ratio numerator?

For state-chartered credit unions, what specific examples of supplemental capital currently allowed under state law do commenters believe should be included in the risk-based capital ratio numerator, and why should they

be included?

What investor suitability, consumer protection, and disclosure requirements should be put in place related to additional forms of supplemental capital?

Do you agree with the positive changes to the RWs? Has NCUA brought them down enough, are any too low, etc.?

If you do not agree with one or more of the positive RW changes, what should the appropriate RW be for those assets?

In the areas of differences between credit union and bank RWs for secured consumer loans, mortgage loans, commercial loans and CUSO investments highlighted above, do you support or oppose these changes?

If you do not agree with any of the differences in RWs for credit unions versus banks, what should the RWs be in those areas?

Are there other changes regarding the RWs that you want to address either positively or in opposition?

Is the current interest rate risk rule that took effect in 2012 sufficient to address concerns with credit unions' management of IRR?

If a new supervisory tool for NCUA is needed regarding IRR, do you support a new regulatory requirement, which generally provides less discretion to examiners, or further guidance that can provide more flexibility to credit unions but also more discretion to examiners?

Do you support either new guidance on or a regulatory provision regarding NEV analysis of a credit union's balance sheet to monitor IRR?

If not, what other approach should be considered on IRR management?

Summary of your position:

[Write the summary of your position here.]

Closing paragraph:

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

Sincerely,

Donna Weston  
Chief Executive Officer  
Bothwell Hospital ECU

cc: CUNA, CCUL