

April 07, 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 a member-owner, as well as President of Oshkosh Postal Employees Credit Union, a small (\$4.6 Mil) credit union by most definitions. This RBC2 proposal will not directly effect my credit union. However, it will effect the movement and the overall view of credit unions.

As many have mentioned, the focus will no longer be on the members (who make us what we are) and member service, but on the bottom line. I have seen this happen with other businesses, where they let the bottom line dictate and service went out the window. What makes CUs great is our service to our members. So why would we want toss that away? I do not see this strengthening the credit union system in any way.

I have been working in the Credit Union movement since 1975 and have seen many changes - so change is not my enemy. However, some of the changes we have seen over the years have not been our friend, have actually hurt the movement and its members. I believe this proposal to be one of them. Please withdraw this proposal.

Thank you for the opportunity to comment.

Sincerely,

Michele Spanbauer
Manager
Oshkosh Postal Employees Credit Union

cc: CUNA, CCUL