

March 19, 2015

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street, Alexandria
Virginia 22314-3428

Re: Comments on Proposed Rule – Capital Planning and Stress Testing—Schedule Shift
(RIN 3133-AE44)

Dear Mr. Poliquin:

I am writing on behalf of SchoolsFirst Federal Credit Union, which serves school employees and their families in Southern California. We currently have more than 636,000 Members and \$11.1 billion in assets. SchoolsFirst FCU appreciates the opportunity to once again provide comment and feedback to the NCUA with regards to the regulation, requirements and terms, within the Capital Planning and Stress Testing—Schedule Shift Proposed Rule. We would like to address two areas of concern and thank the NCUA in advance in taking into consideration our recommendations

Comments

The NCUA is proposing to release the stress test scenarios on February 28, which is 13 days after the banking agencies' new scenario release date of February 15. We are proposing for credit unions to rely on the banking agencies' stress test scenarios and allow the NCUA to have until February 28 to make any required revisions to the content the banking agencies release. The additional time will assist credit unions with the preparation and completion of the stress test analysis

In the proposal, the Board notes that credit unions will be given four months from the as-of date to complete their capital plan; however, this is not taking into account that credit unions cannot begin their stress test analysis until the scenarios are released. This proposed change will not provide adequate time for the credit unions to conduct a thorough analysis and make the necessary revisions. Since the NCUA is proposing to release the stress test scenarios on February 28, credit unions would be allocated only 60 days to complete and submit their results in comparison to similar sized banks (\$10B-\$50B) that are allowed five months or until July 31st to submit their regulatory plan. We are proposing the time allotted for credit unions to complete their stress test

conform to what is required of banks currently. This would allow credit unions the ample time to not only conduct the stress test, but establish the adequate infrastructure to analyze the results and determine the need to make further revisions.

Summary

In conclusion, we request that the NCUA review and reconsider the new requirements under the proposed rule based on the items we have addressed above. Our objective is to ensure credit unions are given a fair amount of time to conduct and submit their analysis and required changes. By shortening regulatory deadlines, the impact is felt greatly by credit union operations and employees.

Thank you for the opportunity to comment on this proposed rule and for considering our feedback and comments regarding the new terms and requirements within the Capital Planning and Stress Testing—Schedule Shift Proposed Rule. We appreciate your review and consideration of our comments and recommendations.

Sincerely,



Francisco Nebot
SVP, Chief Financial Officer
SchoolsFirst Federal Credit Union

Cc: Credit Union National Association (CUNA)
California/Nevada Credit Union League (CCUL)