

From: [Debie Keesee](#)
To: [Regulatory Comments](#)
Subject: Debie Keesee - Comments on Advance Notice of Proposed Rulemaking for Supplemental Capital
Date: Tuesday, May 09, 2017 3:51:26 PM

Gerald Poliquin, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Dear Mr. Poliquin:

Thank you for this opportunity to submit comments in response to the ANPR regarding Supplemental Capital.

I write to you today on behalf of Spokane Media Federal Credit Union. Our credit union is 11 million in assets with 1,200 members and a full time staff of four. We have always provided robust products and services to our members at the best possible price. We are a cooperative so that is what we are supposed to do. Frankly we have been doing that since we were chartered in 1938. While our credit union is a long way from having to be concerned about the recent final rule on RBC that doesn't mean that we wouldn't benefit from having the ability to utilize additional capital.

Access to supplemental capital is a valuable resource for all well managed credit unions to assist in meeting member needs. Current capital requirements can restrict the ability of credit unions of all sizes to serve their members. Our credit union personally experienced the board conversation of potentially having to limit member deposits during the recent recession and the flight to safety with our assets increasing over 25% in a two year period.

The advance notice acknowledges that the supplemental capital rules will need to have safeguards that recognize the uniqueness of our cooperatives and our member first philosophy. I would also ask that the rule must be flexible enough to allow for credit unions of all sizes to take advantage of the new tools provided by the rule. Recognizing this rule could and would benefit all credit unions.

I appreciate the NCUA Board and staff recognizing the need to make changes prior to the RBC rule taking affect and appreciate your consideration for credit unions of all sizes as you work through the rule making process.

Thank you for the opportunity to comment and for considering my comments.

Debie Keesee, CUDE
President/CEO
NMLS # 809150
Spokane Media FCU NMLS # 401941
6103 N Astor St
Spokane WA 99208
509.838.8960

debiek@smfcu.org

FAX 509.456.4697

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