

Via online submission: <http://www.ncua.gov/Legal/Regs/Pages/PropRegs.aspx>

August 28, 2018

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

Dear Mr. Poliquin:

Re: Comments on Proposed Rule RIN 3133-AE90; Risk-Based Capital – Supplemental Rule

Alaska USA Federal Credit Union (“Alaska USA”) appreciates the opportunity to respond to the National Credit Union Administration (“NCUA”) Board’s August 8, 2018, Request for Comments on the Risk-Based Capital – Supplemental Rule. Specifically, the Board is seeking input on a proposed amendment to NCUA regulations that would: 1) delay the effective date of the NCUA’s October 29, 2015, final rule regarding risk-based capital (the “Final Rule”) for one year; and 2) amend the definition of “complex” credit union by increasing the threshold level for coverage from \$100 million to \$500 million in assets.

Alaska USA is a federally chartered credit union with \$7.5 billion in assets, serving over 650,000 members throughout the United States and the world. We support the maintenance of a safe and sound capital framework for credit unions that is flexible, cost effective, and does not expose the share insurance fund to undue risk. Although we take no position on changes to the definition of “complex”, we support the Board’s proposal to delay implementation of the Final Rule to January 1, 2020.

We previously commented that implementation of the Final Rule on January 1, 2019, provided limited time for the NCUA to make the required technical changes to the 5300 reporting, and credit unions to adjust their processes, business strategies, and balance sheets to accommodate. Such adjustments take time, in part due to the complexity of the Final Rule and credit unions’ limited options for raising capital. We continue to support delayed implementation of the Final Rule to allow the NCUA additional time to provide early guidance on new reporting requirements, helping to mitigate any potential impact the Final Rule may have on the credit union industry.

Alaska USA appreciates the opportunity to comment. Please feel free to contact me at c.schwab@alaskausa.org or (907) 222-8985 if you have any questions.

Sincerely,



Cory Schwab
Chief Risk Officer