

**Corporate Offices**

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September 4, 2018

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

Risk Based Capital  
RIN 3133-AE90

Dear Mr. Poliquin:

Sun East Federal Credit Union (Sun East) appreciates this opportunity to comment on the NCUA's proposed rule on risk-based capital (RBC). Sun East is a multiple group common bond federal credit union with approximately \$563 million in total assets. Given our asset size, Sun East has a stake in the proposed rule.

The proposal delays the effective date of RBC by one year, to January 1, 2020. The proposal also amends the definition of the term, "complex credit union," increasing the asset size threshold to \$500 million from \$100 million.

We appreciate and support the extension of the effective date for RBC. As NCUA notes in the background and summary to the rule, the additional time will assist credit unions with adjusting processes, systems, and procedures. The extension will also help with longer term planning and budgeting.

We support a capital framework that is cost effective and protects the credit union system and members from undue risk. We appreciate NCUA's effort to address the riskier attributes of certain assets. For example, the proposed adjustments to the complexity ratio focus on the more complex aspects of the assets in question. We expect these adjustments will be beneficial in terms of determining the RBC requirement. Removing the indicator for internet banking is appropriate. Offering internet banking services is not an indication of risk.

Very truly yours,



Deborah Cook  
SVP/CFO  
Sun East Federal Credit Union

 NCUA

 ESI

**Deposits Insured up to \$500,000**  
\$250,000 by the National Credit Union Administration, a  
U.S. Government Agency, and \$250,000 by ESI, a licensed  
property and casualty insurer. ESI is not a government agency.