



September 7, 2018

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

Re: Comments on Notice of Proposed Rulemaking  
Risked Based Capital – Supplemental Rule; RIN 3133-AE90

Dear Mr. Gerald Poliquin,

On behalf of GECU, the largest locally owned state-chartered credit union in El Paso, TX, this letter is in response to the request for comments regarding the National Credit Union Administration's (NCUA) proposed rulemaking addressing the Risked Based Capital – Supplemental Rule. GECU currently serves a membership of over 376,000 with assets greater than \$2.7 billion and we appreciate the opportunity to comment on this proposal.

We agree with the NCUA's proposal to revise the definition of a complex credit union to include credit unions with assets greater than \$500 million. The proposed increase to the threshold for coverage will provide regulatory relief to many credit unions, although this will not directly impact GECU.

We are also in agreement with extending the implementation date of the risk-based capital requirements. However, we would like to recommend aligning the implementation date with the timeframe set forth in Section 701 of H.R. 5841, "Foreign Investment Risk Review Modernization Act of 2018," which recently passed the House and is now being considered in the Senate. We appreciate the extension of the effective date of the rule to January 1, 2020 provided in the NCUA's proposal; however, we believe credit unions would be better served by delaying the implementation date by two years, further extending to January 1, 2021.

We appreciate the opportunity to comment on this proposal. If you have questions regarding our comments, please contact me at (915) 774-8203.

Sincerely,

A handwritten signature in black ink, appearing to read "Crystal Long", is written over a light blue horizontal line.

Crystal Long  
President/CEO

CL: dp