

September 5, 2018

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

RE: Risk Based Capital - RIN 3133-AE90

Dear Mr. Poliquin:

Belco Community Credit Union (Belco) appreciates this opportunity to comment on the NCUA's proposed rule on Risk Based Capital (RBC). Belco is a federally insured, state-chartered credit union with approximately \$600 million in total assets. Accordingly, we have a stake in the regulation.

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.

Sincerely,
Belco Community Credit Union



Samuel Glesner
SVP, Corporate Support