



September 7, 2018

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

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

We at CASE Credit Union appreciate the opportunity to comment on the proposed rule changes for “Risk-Based Capital- (RBC) Supplemental Proposal”. We agree with the proposal to change the definition of a complex credit union from \$100M to \$500M and delay RBC implementation until January 1, 2020.

Changing the threshold definition of a complex credit union will provide regulatory relief for smaller credit unions. Small credit unions can find it challenging to keep up with the ever increasing burden of compliance.

Extending the date will provide credit unions time to adjust strategies, processes and balance sheets. Such adjustments can take time to ensure compliance with the final rule.

CASE Credit Union thanks you for requesting our feedback.

Sincerely,

Jacob Cook
Vice President of Finance and CFO
CASE Credit Union