

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

Re: Indiana Credit Union League Comments on Risk-Based Capital--Supplemental Proposal (RIN 3133--AE90)

Dear Mr. Poliquin:

The Indiana Credit Union League (ICUL) appreciates the opportunity to submit comments on the National Credit Union Administration's (NCUA) Risk-Based Capital Supplemental Proposal. The ICUL member credit unions represent 98% of assets and members of Indiana's credit unions, with those memberships totaling more than two million consumers.

The League appreciates NCUA's consideration extending the effective date of the risk-based capital rule. As we have stated in previous letters to NCUA, we continue to feel this rule is unnecessary. While extending the effective date one year to January 1, 2020, is helpful, we encourage NCUA to consider an extension to at least January 1, 2021, if not a full repeal of this rule. This would be in line with the legislative efforts underway which are supported by ICUL to extend the effective date at least two years to provide more time for efforts to completely repeal the rule.

Should you decide to move forward with this amendment to the rule, we believe the proposed increased threshold for RBC compliance to a credit union with greater than \$500 million in assets is a good start. We believe this threshold should be at least \$10 billion in assets at this point until further review of the rule being repealed. A \$10 billion threshold would align with the eligibility for supervision under the NCUA's Office of National Examinations and Supervision, as well as the threshold for examination under the Bureau of Consumer Financial Protection.

Lastly, we agree with the elimination of online banking as an indicator of complexity. Technological changes are occurring at a very rapid pace. Regulatory language that is very specific in nature as it relates to a certain technology like this is likely to become obsolete or unnecessary in a relatively short period of time.

On behalf of Indiana credit unions, we appreciate the opportunity to comment on this proposal. If you have any questions about our letter, I would welcome the opportunity to discuss it. I can be reached at (317) 594-5320.

Sincerely,



John McKenzie
President, Indiana Credit Union League