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September 6, 2018

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

RIN: 3133-AE90

Dear Mr. Poliquin,

On behalf of the Hudson River Community Credit Union and its 23,000+ members, we appreciate the opportunity to comment on the proposed Risk-Based Capital Supplemental Proposal.

Hudson River Community Credit Union supports the Board's decision to revise the definition of complex credit union from credit unions greater than \$100 million in assets to credit unions greater than \$500 million in assets. Credit unions in the \$100 million to \$500 million dollar asset range face substantial regulatory burden and this would alleviate a portion of that burden while not causing undue risk to the Share Insurance Fund.

While extending the effective date to January 1, 2020 is beneficial we believe that the date should be extended to January 1, 2021 to allow for ample time for credit unions to make the necessary changes needed to ensure compliance with the risk-based capital ratio requirements.

I would like to thank the Board for the opportunity to comment on this important proposal and encourage the Board to carefully consider our concerns before issuing a final rule.

Sincerely,

A handwritten signature in black ink that reads 'Sue Commanda'.

Sue Commanda
Chief Executive Officer