



September 7, 2018

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

Via email to: regcomments@ncua.gov

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

Dear Mr. Poliquin:

Cornerstone Credit Union League (Cornerstone) appreciates the opportunity to submit comments concerning the National Credit Union Administration's (NCUA) proposed changes to the risk based capital-supplemental rule (RBC). Cornerstone represents over 500 federally and state chartered credit unions in Texas, Oklahoma, and Arkansas, which in turn serve over 8.1 million members.

As mentioned in our comments in response to the prior two RBC proposals, Cornerstone maintains that the risk based capital rule is not necessary. The rule places significant unnecessary burdens on credit unions. As a result, we continue to request meaningful change.

Should NCUA proceed with risk based capital rule, we support efforts to raise the threshold for compliance higher than the current threshold of \$100 million. NCUA proposes to raise the threshold to \$500 million, which is a step in the right direction. That said, we believe the threshold should be set even higher at \$10 billion in assets. This would align with the eligibility for supervision under the NCUA's Office of National Examinations and Supervision, as well as the threshold for supervision under the Bureau of Consumer Financial Protection.

Cornerstone supports extending the compliance date, and we suggest that the new compliance date be extended two years (instead of one as provided in the proposal) to January 1, 2021.

Cornerstone supports eliminating online banking as an indicator of complexity for purposes of risk based capital compliance eligibility.

Thank you for the opportunity to provide comments on the risk based capital proposal. Should you have any questions about Cornerstone's comments, please feel free to contact me at (512) 853-8516.

Sincerely,

A handwritten signature in black ink that reads 'Suzanne Yashewski'.

Suzanne Yashewski
SVP Regulatory Compliance Counsel
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syashewski@cornerstoneleague.coop

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