



July 26, 2019

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

Re: Comments on Proposed Rule  
Delay of Effective Date of the Risked Based Capital – Proposed Rule; RIN 3133-AF01

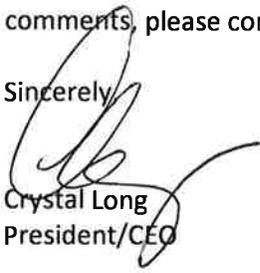
Dear Mr. Gerald Poliquin,

On behalf of GECU, the largest locally owned state-chartered credit union in El Paso, TX, this letter is in response to the request for comments regarding the National Credit Union Administration's (NCUA) proposed rulemaking addressing the Delay of Effective Date of the Risk-Based Capital (RBC) Rules. GECU currently serves a membership of over 388,400 with assets greater than \$2.8 billion and we appreciate the opportunity to comment on this proposal.

We support the NCUA's proposal to delay the effective date of the RBC rule to January 1, 2022. This delay will allow covered credit unions like GECU further opportunity to comply with the requirements of the RBC rules, adjust current methodologies, and meet the increased capital reserve requirements. We also appreciate the NCUA's commitment to fully evaluating capital standards and look forward to the opportunity to comment on any prospective changes concerning asset securitization, subordinated debt, and whether a community bank leverage ratio analog should be adopted as a mechanism for additional relief.

We appreciate the opportunity to comment on this proposal. If you have questions regarding our comments, please contact me at (915) 774-8203.

Sincerely,

  
Crystal Long  
President/CEO

CL: dp