



July 24, 2019

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

Via Email to: [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

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

Dear Mr. Poliquin,

On behalf of the Board of Directors and the Management Team at Capital Communications Federal Credit Union (CAP COM), we would like to thank the National Credit Union Administration (NCUA) for providing us with the opportunity to comment on the above referenced *proposed Rule to Delay the Effective Date of the Risk Based Capital Rule*. Cap Com is headquartered in Albany, New York with assets of \$1.8 Billion as of May 31, 2019 serving 131,000 members.

We fully support the delay of the *Risk Based Capital Rule* (RBC Rule) until January 1, 2022 and commend the NCUA Board for taking this action. Due to the complexities of the RBC Rule and the sophistication of its requirements, it is imperative that the NCUA Board fully explore the impact on credit unions and determine if all of the requirements are sensible and balanced. Additionally, and at the same time, credit unions are in the process of implementing FASB's Current Expected Credit Loss Standard (CECL) and lease accounting requirements. Preparing for these complicated requirements simultaneously is certainly a drain on credit union financial and staffing resources.

While we are considered a larger credit union based on asset size, CAP COM is small when compared to many other banking entities and there are credit unions much smaller than ours. This delay will provide the NCUA with an enhanced opportunity to take a step back and determine the impact of the RBC Rule on credit unions of all assets sizes.

Our credit union's Chief Financial Officer, David Jurczynski, is well versed in the requirements of the RBC Rule and its practical impact on credit unions. Should you find that it might be beneficial to speak with Mr. Jurczynski he can be reached by email at [djurczyn@capcomfcu.org](mailto:djurczyn@capcomfcu.org) or by way of telephone at (800) 468-5500 (ext. 3650).

Sincerely,

Christopher McKenna,  
President/CEO

