

July 26, 2019

VIA E-MAIL ONLY: regcomments@ncua.gov

Gerard Poliquin, Secretary of the Board
NATIONAL CREDIT UNION ADMINISTRATION
1775 Duke Street
Alexandria, Virginia 22314-3428

Re: Patelco Credit Union—Comments on Proposed Rule: Risk-Based Capital—Delay of Effective Date

Dear Mr. Poliquin:

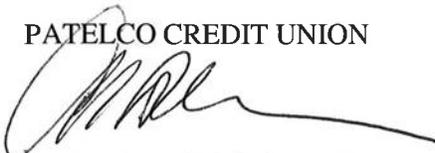
I am writing on behalf of Patelco Credit Union to comment on the proposed delay to the effective date of the Risk Based Capital rules. Patelco is a California chartered credit union originally formed in 1936 to serve Pacific Telephone and Telegraph Company employees; we now serve employer groups, communities in the San Francisco Bay area, Sacramento area, and Central Valley, and associational groups.

Considering the significant need for risk management planning and balance sheet planning associated with changes to Prompt Corrective Action and rules around minimum capital levels, Patelco supports delays to the application of Risk Based Capital rules. We also support the further study included in the Proposed Rule. In particular, we believe that analogizing to the Community Bank Leverage Ratio rules under EGRRCPA could create parity with the community banks existing in the same marketplaces and asset classes as credit unions.

We also agree that pairing rules changes with examination systems changes, and allowing credit unions time to implement CECL, would minimize recourses spent on managing change, providing significant benefit to the industry and the NCUA. This delay would create benefits, not additional risk.

Sincerely,

PATELCO CREDIT UNION



Chris Allen, Chief Risk Officer

