



April 17, 2014

The Honorable Debbie Matz, Chairman  
The Honorable Michael E. Fryzel, Board Member  
The Honorable Rick Metsger, Board Member  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314

Dear Chairman Matz, Board Member Fryzel and Board Member Metsger:

On behalf of our respective organizations, the Credit Union National Association and the National Association of Federal Credit Unions, we respectfully request that the National Credit Union Administration Board extend the comment period for an additional 90 days on the agency's proposal regarding risk based capital that was published in the Federal Register (*See* 79 FR 11184, Feb. 27, 2014).

Our organizations had previously asked for an extension of 90 days on February 28, 2014, which was denied. We simply do not believe that the comment period provides sufficient time for a number of credit unions to analyze the proposal's impact on their individual operations and prepare their responses. As the deadline for submitting comments is fast approaching, we again call for an extension of 90 days.

As we indicated in our previous request, the risk-based capital proposal is the most significant proposed rulemaking that credit unions will face this year and likely for years to come. Such an extension of the comment period will allow credit unions, which are struggling in a number of cases to meet new regulatory requirements this year, much needed additional time to provide the agency with substantive comments reflecting their particular situations.

Given the health of the credit union system, we do not see the need to rush this rule and believe more time for comments will also benefit the agency through the production of well-reasoned letters. We urge the NCUA Board to allow credit unions an additional 90 days to consider the implications of the proposal for their institutions, members, and communities and to develop thoughtful comments that will improve the comment process for credit unions and the agency.

Thank you in advance for your timely attention to this request.

Best regards,

A handwritten signature in black ink, appearing to read 'Dan Berger', with a stylized, sweeping flourish extending to the right.

Dan Berger  
NAFCU  
President and CEO

A handwritten signature in black ink, appearing to read 'Bill Cheney', with a large, circular flourish at the beginning and a long, horizontal tail extending to the right.

Bill Cheney  
CUNA  
President and CEO