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**National Association of Federally-Insured Credit Unions**

June 25, 2018

The Honorable Paul Ryan  
Speaker  
United States House of Representatives  
Washington, DC 20515

The Honorable Nancy Pelosi  
Minority Leader  
United States House of Representatives  
Washington, DC 20515

**Re: H.R. 5841, the *Foreign Investment Risk Review Modernization Act of 2018***

Dear Speaker Ryan and Leader Pelosi:

On behalf of the National Association of Federally-Insured Credit Unions (NAFCU), the only trade association exclusively representing the federal interests of our nation's federally-insured credit unions, I write in conjunction with tomorrow's scheduled House consideration of H.R. 5841, the *Foreign Investment Risk Review Modernization Act of 2018*. We appreciate the leadership of House Financial Services Committee Chairman Jeb Hensarling and Ranking Member Maxine Waters in moving this bill forward and for including a provision that provides increased regulatory relief to credit unions, and we urge the House to pass this important legislation.

The legislation, introduced by Representative Robert Pittenger, has language in Title VII that would delay the National Credit Union Administration's (NCUA) risk-based capital (RBC) rule from taking effect by two-years, moving the implementation date from January 1, 2019 to January 1, 2021. NAFCU is very supportive of Title VII and believes it is imperative that the House advance this provision as part of H.R. 5841 and fight to include it in any conference with the Senate due to the short time period for this provision to be enacted before this harmful rule takes effect. The RBC rule as written will have a negative impact on the industry. Dozens of credit unions stand to see a downgrade in their capital levels and more than 400 credit unions will see a decline in their capital cushions. A two-year delay in the rule would give credit unions more time to prepare and comply, and more importantly, it would give the NCUA time to fix the rule, which they have expressed interest in doing.

Once again, we strongly support Title VII of H.R. 5841 and thank you for your attention to this important legislation and your efforts to provide credit unions with regulatory relief. Should you have any questions or require any additional information, please contact me or Allyson Browning, NAFCU's Associate Director of Legislative Affairs, at 703-842-2836 or [abrowning@nafcu.org](mailto:abrowning@nafcu.org).

Sincerely,

Brad Thaler  
Vice President of Legislative Affairs

cc: Members of the United States House of Representatives