

From: [Mary Dunagan](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action – Risk-Based Capital Comment Letter
Date: Friday, April 18, 2014 11:41:37 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Texas Workforce Credit Union, which serves the Texas Workforce Commission employees, family members and employees in our office building. We have 1,100 Members and 9.5 million in assets. The Texas Workforce Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

How would your credit union be affected by the proposal? As we grow, the added burden has the potential to devastate our bottom line. It would have a negative impact on how we could serve our members.

Do you agree this new proposal is necessary? Credit Unions are already more than adequately capitalized and as well maintaining an adequately funded allowance account for risk based loans.

Do you agree NCUA should be able to impose higher capital requirements on credit unions on a case by case basis? That would be the most fair way of handling the problem.

Summary of your position:

As a small Credit Union who hopes to grow, this could be detrimental to our financial health.

Thank you for the opportunity to comment on this proposed rule and for considering our views on risk based capital requirements.

Sincerely,

Mary Dunagan, President
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