

**From:** [Evie Rasmussen](#)  
**To:** [Regulatory Comments](#)  
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Many will focus their comments on the financial strains this proposed ruling will have on their organizations. My comments will empathize the loss to our members.

Few will note nor care that credit unions, as we knew them, are systematically dying. Suicide by the installment plan, if you will. The Federal Credit Union Act has been amended numerous times since the passage of the Monetary Control Act in 1980, when I started my credit union career. Each amendment has moved us away from being member driven and functioning as a not-for-profit and toward being just another financial institution. Some we have done to ourselves in our quest for growth, but our regulator insists on driving nails into our coffin on a regular basis.

Yes, as a whole we lost money and cost the share insurance fund during the Great Recession. But only a fraction of what the banks cost the government: 26 cents to \$2.30. Which begs the question ... "why punish credit unions?" Why demand that they hold double net worth against the banks? Why force us to be net worth driven rather than member centric? If what the NCUA board members say is true, that only 200 credit unions will be affected then why not just make a ruling for those choices instead of including all of us? That's what DOR's, LUA's etcetera are for.

Granted, we are under the magical \$50m but we have gone through enough subjective examiner rulings that what is said or even written is not always the real rule. Anyone believing otherwise has not run a small credit union.

So, NCUA wants us to be more bank like. Same rules - but often more of them, same standards - only higher, same net worth - with less to work with. With all the risks to running a credit union, I now have to add one more - Regulator Risk. For those who made business loans, they will not be off the books in 18 months. For those who made mortgage loans, they too are on the books. Long-term investments - still there. The NCUA wants us to be risk adverse, yet add to our bottom lines. Can't be done. The very notion that we deal with money and therefore the economy where we have no control - means we take risk.

In My Credit Union.com it states the following:

In the United States, credit unions are not-for-profit organizations that exist to serve their members rather than to maximize corporate profits. Like banks, credit unions accept deposits and make loans. But as member-owned institutions, credit unions focus on providing a safe place to save and borrow at reasonable rates. Unlike banks, credit unions return surplus income to their members in the form of dividends.

This single ruling, more than any others before, changes everything. Banks must make profits for their stockholders - now you propose that we make profits for ..... NCUSIF. In other words my members will cease being the owners, NCUA will own the credit union. It's not new, as the changes have been headed in that direction for some time, now it will simply be transparent. The dream is dead.

For a bank, financial returns are a perfectly legitimate measure of performance. For a not-for-profit, the critical question is not “how much money do we make per dollar of invested capital” but “how effectively do we deliver on our mission and make a distinctive impact, relative to our resources? We, credit unions, did NOT commit the atrocities that lead to the Great Recession. Let the banks be banks – STOP punishing us.

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