

From: [Allison Marinoni](#)
To: [Regulatory Comments](#)
Cc: [Cleo Segovia](#)
Subject: Allison Marinoni – Comments on Proposed Rule: PCA – Risk-Based Capital
Date: Thursday, May 15, 2014 11:33:05 AM



May 09, 2014

Mr. Gerald Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Re: Resource One Comments on Proposed Rule: PCA – Risk-Based Capital

Dear Mr. Poliquin:

As an employee of Resource One, I would like to take the time to address my personal concerns regarding the proposed Risk-Based Capital Rule. While I support the requirements for credit unions to be financially healthy, the proposal would instead have an adverse effect on the movement. I would like to express my concerns and offer the following comments with the intent to improve the proposal:

- The current system works, credit unions came through the last Recession, the worst financial crisis since the Great Depression, just fine. Resource One has long demonstrated consistent growth since it was originally chartered. Although I believe the NCUA is making motions to improve capital risk within the credit union movement, there seems to be flaws in its current state.
- Although the proposal has good intentions for the movement, the one-size-fits-all approach applies to categories of assets, is a major weakness. We are all unique and there should be a better consistency with the proposal.
- Credit unions came through the last Recession in 2007-08, the largest recession since the Great Depression just fine, without the needing one penny of taxpayers' dollars.

I appreciate your willingness to allow me to express my comments on this impactful regulatory proposal. I respectfully encourage you to consider improvements to the proposed Risk-Based Capital Rule in accordance with my views included in this letter. Thank you again for the opportunity to voice my opinions and comments on the proposal.

Sincerely,

Allison Marinoni
Team Lead

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