

**From:** [Kyle Brisendine](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [Cleo Segovia](#)  
**Subject:** Kyle Brisendine - Comments on Proposed Rule: PCA – Risk-Based Capital  
**Date:** Thursday, May 15, 2014 3:14:43 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
**Importance:** High

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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:

- Credit Unions have survived various economic downturns, such as the last Recession. Why is more capital needed, if with the Recession, we proved that the movement had adequate capital? The excess capital will come at the expense of our members.
- The examiner discretion” to change an asset’s risk rating is a major flaw by NCUA. It is crucial for credit unions to know objectively what their regulatory capital expectations are to better manage specific goals. The capital rule should be standardized for all credit unions. If the regulation is properly developed there should be no reason to change a risk rating.
- The increase in the MBL reserve percentages based on concentration of 150-200% when the banking industry is at 100% appears excessive. Credit unions require have personal guarantees on their business loans when this is an option for the banks. We inherently are more conservative and this will limit our ability to be competitive.

I appreciate the opportunity to voice my concerns regarding the proposed Risk-Based Capital Rule. I sincerely hope you take my comments and views into considerations for possible improvements on the proposal.



**Kyle Brisendine**

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