

May 15, 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:

This letter speaks from the perspectives of Resource One in regards to the NCUA's proposal on PCA – Risk-Based Capital. Resource is based in Dallas, Texas and serves more or less 48,000 members within the Dallas and Northwest Harris Counties. I sincerely appreciate the opportunity to comment on this extremely imperative issue. While I support the requirements for credit unions to be financially healthy, the proposal might rather have an adverse effect to credit unions.

For starters, credit unions have survived many significant economic downturns, for example, the last Recession. Why is more capital required, if with the Recession, we demonstrated that credit unions had satisfactory capital? The abundance capital will come at the expense of our members.

Furthermore, the weightings for balance sheet items are significantly different than those required for banks by Basel III. The RBC proposal regulation seems to use restrictive percentages from Basel III while ignoring some standards that may be more liberal in other areas.

Ultimately, establishing an 18-month time period to these requirements is insufficient time to permit credit unions to reposition their balance sheets effectively to increase the required capital. Credit unions need to be permitted more of an opportunity to strategize and plan for the proposal.

I infer that in spite of the fact that the proposal is praiseworthy in principle, however certain propositions of the proposed rule need to be reexamined. I ask that the proposed standards be reevaluated and refined to permit all credit unions the ability to compete in the market place and to serve our members' needs.

Sincerely,



B.A. "Tony" Goebel
Secretary/Treasurer of the Board



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