

From: [Greg Gummerson](#)
To: [Regulatory Comments](#)
Cc: patrick.smith@ilcusys.org
Subject: Proposed Rule: PCA Risk Based Capital RIN3133-AD77
Date: Tuesday, May 20, 2014 10:17:29 AM

Mr. Gerard Poliquin
Secretary of the Board
NCUA
1775 Duke St
Alexandria VA 22314-3428

Dear Mr. Poliquin:

I would like to comment on the proposed rule change regarding risk based capital. As a 45 million asset credit union with approximately 4,000 members, this potential rule change could affect us in the near future.

Our credit union currently has a capital/asset ratio of 24%. During the financial crisis of the last 4-5 years, we have experienced the NCUA Share assessment, the Corporate Credit Union bailout assessment, and the writing off of our membership capital at Members United Corp FCU. However, in no year did we fail to turn a net profit, which few credit unions can claim.

We make no business loans. We make no indirect loans. We ceased making first mortgage loans three years ago due to the nightmare compliance issues. We have a conservative investment policy. I can think of no financial crisis that could be any worse than what we have already weathered.

Credit unions do not need a risk based capital rule. Capital is what it is, an objective concrete finite number. It should not be subjective to an examiner's whims (as in they feel you have too many indirect loans, too many signature loans, etc.)

I have been president of our credit union since January 1987. Rules and regulations and compliance issues are making it so much harder to open our doors and serve our members on a daily basis. Please don't make it any harder.

Thank you.

Greg Gummerson
President
Galesburg Burlington Credit Union
Galesburg Illinois