

From: [Becky Razak](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 21, 2014 11:00:06 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Kansas Air Guard Credit Union, which serves the Kansas Air National Guard. We have 661 Members and \$4.8 million in assets. Kansas Air Guard Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

How would your credit union be affected by the proposal?
Additional struggle to minimize costs while retaining necessary earnings make growth extremely difficult.

Do you agree this new proposal is necessary?
No as credit unions are particularly sensitive to earnings for their members.

Do you agree NCUA should be able to impose higher capital requirements on credit unions on a case by case basis?
Yes.

Do you agree with the risk weightings for:

- MBLs yes
- Mortgage Loans no
- Longer-term investments yes
- Consumer loans no
- CUSOs Investments and Loans no
- Others (Please identify)

Should the NCSUIF deposit be excluded from the calculation of RBC ratios?

Have not determined

Should goodwill be excluded from the calculation of the RBC numerator?

Have not determined

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide?

Absolutely not.

Do you agree with NCUA's implementation time line? If not, how much more time should credit unions be provided?

Double the time line.

Do you have other concerns with the proposal? Please explain.

Summary of your position:

[Write the summary of your position here.]

Thank you for the opportunity to comment on this proposed rule and for considering our views on risk based capital requirements.

Sincerely,

Becky Razak
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