

From: [Stephanie Singleton](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 21, 2014 11:50:59 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Cicost Federal Credit Union, which serves a community membership. We have 3300 Members and 19 million in assets. Cicost appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

Fix the proposed risk weights to reflect marketplace realities: The current weights bear no relationship to actual credit union losses over time - both from the standpoint of losses relative to those in the banking sector and from the standpoint of comparative losses within credit union portfolios.

Remove the interest rate risk component from the calculation and keep interest rate risk evaluations in the realm of the examination function.

Remove the proposal to allow examiners to impose arbitrary requirements.

Index the \$50 million threshold definition of "complex". Consider providing a "safe harbor" definition of non-complex that would allow CUs to avoid the "complex" definition.

Should the NCSUIF deposit be excluded from the calculation of RBC ratios? Yes, being a small credit union taking money to bail out corporate credit unions has severally caused an issue for our credit union.

Sincerely,

Stephanie Singleton
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