

From: [Teresa Santana](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 21, 2014 10:40:56 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Wanigas Credit Union which serves 9 counties in Michigan. We have 25,500 Members and over \$294 million in assets. Wanigas 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.

This proposal is not necessary and the NCUA has not justified the need adequately. The NCUA should not be able to impose higher capital requirements on credit unions on a case by case basis.

A number of the risk weightings, especially for member business loan and mortgage concentrations as well as for CUSO investments, do not appear to be properly calibrated for credit unions. Using higher risk weights on long-term assets to deal with interest-rate risk is misleading without considering liability maturities.

The NCSUIF deposit should not be excluded from the calculation of RBC ratios.

Goodwill should not be excluded from the calculation of the RBC numerator.

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

Sincerely,

Teresa Santana
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