

From: [Richard Ahlborn](#)
To: [Regulatory Comments](#)
Subject: Attention: Secretary of the Board - Poliquin -Risk-Based Capital
Date: Thursday, May 22, 2014 12:45:36 PM

Dear Secretary of the Board Poliquin,

I am a member of Chartway Federal Credit Union with 1.9 billion dollars in assets and membership of 180,000. I am writing in reference to the following Risk-Based Capital proposals:

- "One size capital requirement fits all" credit unions
- The implementation period of ten months in comparison to bank's nine years under Basel III
- Justification for credit unions' requiring a higher capital ratio compared to banks
- Justification for subtracting *good will* from net worth when calculating Risk-Base Capital
- The requirement of more capital to be held from earnings thereby reducing members' dividends and increasing loan rates

I sincerely hope that NCUA will take careful consideration of these comments in order to develop a Risk-Based Capital regulation for the benefit of credit unions and their members.

Richard R. Ahlborn
Volunteer Board Member
Chartway Federal Credit Union

Copy to:
Senator Bill Nelson
Senator Marco Rubio

Sincerely,
Richard R. Ahlborn
321 NE 19th Place
Cape Coral, FL 33909