

**From:** [Rose Gilliam](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Friday, May 23, 2014 3:00:07 PM

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Dear Secretary of the Board Poliquin,

Argent Federal 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.

Although initially, the proposed rule has only a minor effect on our Credit Union, it is concerning to us that as we begin to offer business loans to meet the needs of our members, this new rule can have a much larger impact than the existing regulation.

Particularly troubling is the language in the proposed rule that credit unions can be subjected to even higher amounts of capital requirements on a case-by-case basis, beyond the levels calculated based on the formulas. This subjectivity causes undue uncertainty for all credit unions and can lead to an overall decline in service to the membership.

The NCUSIF deposit should not be excluded from the RBC calculation. Federally insured credit unions have built this fund over many years and the amount on each of our balance sheets represents another layer of protection, thus should be counted.

It is important that the Risk Based Capital rule contain reasonable non-subjective components that do not unduly cripple credit unions' abilities to provide the products and services desired by their members.

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

Sincerely,

Rose E. Gilliam, President/CEO  
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