

**From:** [Dale Taylor](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Friday, May 23, 2014 3:10:45 PM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of [your credit union name], which serves [your field of membership]. We have [number] Members and [dollar amount] in assets. [Your credit union name] 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?

Do you agree this new proposal is necessary?

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

Do you agree with the risk weightings for:

- MBLs
- Mortgage Loans
- Longer-term investments
- Consumer loans
- CUSOs Investments and Loans
- Others (Please identify)

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

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

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

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

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

Summary of your position:

Please table this proposal. More information and long term affects should be studied. Some Credit Unions who are forced to comply if this rule is adopted will have to close or merge. Sometimes the anticipated rewards are definitely not worth the risk.

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

Sincerely,

Dale Taylor  
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