

**From:** [Beth DeWitt](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Tuesday, May 27, 2014 3:30:51 PM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of Erie Community Credit Union, which has a community charter. We have 15,000+ Members and 100 million in assets. Erie Community 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.

Erie Community Credit Union is adequately capitalized, if this proposal goes through, like so many other credit unions, it will be the membership that suffers the most. We will need to pull monies from areas that benefit the membership, from new products and services, to increased fees.

Credit Union's struggle today to remain competitive, and to offer the best products and services, this new capitalization proposal would be a negative to the very members we serve.

We as a credit union do not agree with the proposal. The idea of picking and choosing is also in our opinion not a good idea.

We believe that our members deserve our best, and with all the compliance regulations, and increased cost of doing business, this is just an undue burden.

Sincerely,

Beth L DeWitt EVP  
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