

From: [Judith Lehmann](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Tuesday, May 27, 2014 10:40:51 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Fidelity Federal Credit Union, which serves [the community of Sandy Springs, GA. We have 5,013 Members and \$25,000,000 in assets. Fidelity FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

I don't agree this new proposal is necessary.

I do not agree that the NCUA should apply these standards on a case-by-case basis.

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

I do not agree NCUA should be able to restrict dividend payments as the proposal would provide.

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

Sincerely,

Judith O. Lehmann, CEO
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Atlanta, GA 30350