

From: [Marty Tressell](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Tuesday, May 27, 2014 7:20:52 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of High Plains Federal Credit Union, which serves a Curry County New Mexico. We have 7500 Members and \$42M in assets. High Plains 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.

As we will not be directly impacted by the proposal at this time it would seem unnecessary for us to comment and yet given the nature of the current government in Washington D.C. it is imperative that I do comment! Knowing full well unchecked regulations can be damaging to credit unions attempting to server their members even to the point of making us extinct!

Credit Union Boards and Management not regulators made it through the financial crisis of 2007-2010...yes NCUA did a lot of work to be certain that Credit Unions were not penalized for the sins of the Banking community for that we are grateful. And Credit Unions still Paid a big price in reductions in Capital and increased regulation!

We do not need more regulation especially this regulation...NCUA never used the current Risk Based Capital calculations for anything in fact when I ask examiners about it they gave me the "deer in the headlight" look they had no clue what I was talking about!

Another fact we have a capital requirement based in LAW not regulation and I see no justification for a regulation that has no bases in the Law...we have a capital requirement and we all, Credit Unions and NCUA must follow it!

There are a lot more knowledgeable people who have responded to these proposals that have discussed in detail how their credit unions will be impacted significantly now and in the very near future by this regulation. I will not attempt to restate what they have said...what I can say is I agree with them and you can count us among them in our disagreement with this regulation!!!!

Let Credit Union Boards and Management manage the amount of Capital needed to protect the risk they wish to take! We did through the Crisis we can continue to do so!

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

Sincerely,

Marty Tressell, President/CEO
3724 Ray Hardy Dr
Clovis, NM 88101