

From: [mark.massey](#)
To: [Regulatory Comments](#)
Cc: [Mark Massey - MY](#)
Subject: Prompt Corrective Action - Risk Based Capital Comment Letter
Date: Wednesday, May 28, 2014 8:37:09 PM

May 28, 2014

Gerard Poliquin, Secretary of the Board
National Credit Union Association
1775 Duke Street
Alexandria, Va. 22314-3428

Re: Comments on Proposed Rule: PCA-Risk Based Capital
RIN 3133-AD77

NCUA Board,

I am writing to comment on the proposed risk-based capital rule. I work for My Credit Union, based in Fort Worth, TX. Our membership numbers are nearly 9,000 and we have approximately \$43,000,000 in assets with six branches.

In March 1991, I began as the President of this credit union totaling 5,000 members, \$3.0 million in assets.

It was a different era then, as State & Federal Regulators worked with our organization to become a viable entity. Today, it is rare for a small or mid-size credit union that becomes Undercapitalized (<7% Net Worth) to be allowed the time to become viable, before being merged. With this experience, I am concerned when higher levels of Net Worth or Risk-Based Capital (RBC) are being proposed.

Bottom line is: please leave us alone. I would prefer you work on reduction of burdensome regulations. Washington continues to come up with knee jerk reactions to problems in banking that bring on more regulations on the little guy especially(us). Please divert your attention to something more helpful like retiring old out of date and unfriendly regulations.

Just straight to the point: I oppose this and the entire barrage of regulations. Let us serve our members.

Respectfully

Mark Massey
President, My Credit Union