

From: [maria.lavelle](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 28, 2014 11:50:10 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Westmoreland Community Federal Credit Union, which serves Westmoreland County. We have 14,283 Members and \$66 million in assets. Westmoreland Community 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.

The proposal will classify my credit union as adequately capitalized versus being well capitalized under today's rule. We currently are facing challenges in regards to controlling growth and this new rule will make that more difficult. I do agree the new rule is necessary and support the idea of risk based capital based on the individual balance sheet of each credit union. I do not agree that NCUA should be able to impose higher capital requirements on credit unions on a case by case basis. We have positive experiences with our NCUA Examiners but there has been inconsistencies from one examiner to the next. The authority to be able to require higher capital requirements is completely subjective to the opinion of the examiner onsite at that time.

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

Sincerely,

Maria A. LaVelle, Chief Executive Officer
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Latrobe, PA 15650