

From: [Employees Credit Union](#)
To: [Regulatory Comments](#)
Subject: Comments on Proposed Rule: PCA-Risk Based Capital
Date: Wednesday, May 28, 2014 4:36:24 PM

To whom it may concern,

I would like to express my opinion regarding the proposed: PCA Risk Based Capital Rule.

I do not understand the logic behind the proposed risk rating of 250% capital for our investment in a CUSO. Our operating agreement governing our Community Business Lenders Service Company, LLC, CUSO investment, does not allow for a capital call. Also, when considering the NCUA requirement of a corporate veil between the CUSO and the ownership I am further perplexed by the 250% proposed risk weighting. I would hope this could be adjusted to 100% in the final regulation.

The proposed rule allows for examiners to arbitrarily establish capital guidelines higher than the proposed guidelines. This seems to be an opportunity for areas of uncertainty, and large disagreement. It seems appropriate to eliminate the subjective nature of the proposed regulation.

I am thankful for this opportunity to voice my opinion. I hope it is considered in future versions of this proposed regulation.

Thank you,

Mark Peters
CEO