

**From:** [Amanda Nunez](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk Based Capital Requirement Comment  
**Date:** Wednesday, May 28, 2014 5:58:12 PM

---

May 28, 2014

Gerard Poliquin, Secretary of the Board  
National Credit Union Association  
1775 Duke Street  
Alexandria, VA 22314

Requesting Corrective Action to Risk Based Capital Requirements

This letter respectfully comes to you on behalf of White Crown Federal Credit Union of Denver, CO. I believe that the attempt to make credit unions more comparable to banks is not only unnecessary, but very harmful to the Credit Union Industry. Should these Risk Based Capital Requirements be imposed as currently written, I am concerned for the future of credit unions.

First, the Credit Union Industry has remained healthy through the recent economy downturn. Current measurements of credit union economic health have proved to be effective thus far. Furthermore, throughout the history of credit unions, credit unions have realized significantly fewer losses per dollar than the banking industry.

Similarly, I know our small Credit Union (we have roughly 6,400 members), as well as others, would suffer significantly due to the complexity of this regulation and cost to impose it. We would have to spend significant time reorganizing our balance sheet which could be better spent serving members. Finally, and most importantly, these capital requirements would tie up our assets and limit the services and products we would be able to continue offering our members.

To prevent hurting the Credit Union Industry as a whole, I recommend pushing back the date of this imposed rule. Eighteen months is not enough time to reorganize our balance sheet and understand the entire rule, to comply. Additionally, I ask that you allow credit unions to count NCUSIF deposit and entire ALLL balance as assets.

Thank you very much for your time and considering my comment.

Respectfully,

**Amanda Nunez**

**Accountant**

**Telephone:** 303.534.4448 x 115

**Fax:** 303.534.5799

**Address:** 2001 Lincoln Street, Suite 100 - Denver, CO 80202

A promotional banner with a black border. On the left is a small illustration of a person riding a motorcycle on a road. To the right of the illustration, the text "SPRING HAS SPRUNG" is written in a large, blue, sans-serif font, followed by "GET YOUR BIKE, BOAT OR RV LOAN" in a slightly smaller, blue, sans-serif font. Below this text, a thin horizontal line separates it from the text "Close your loan between March 1 & May 31 and be entered to win a \$500 gift card." which is written in a smaller, black, sans-serif font.

**Have you heard?** White Crown FCU offers FREE Checking Accounts.

Follow us online: [Facebook](#) | [Twitter](#) | [Website](#)

CONFIDENTIAL: This email may contain confidential information pertaining to White Crown Federal Credit Union and our members. The information contained in this email transmission is intended only for the use of the addressee(s), named on the email. If you are not an addressee, or the employee or agent responsible for delivering it to an addressee, you are hereby notified that any use, dissemination, distribution, publication or copying of the information contained in this email is strictly prohibited. If you have received this email in error, please notify us by telephoning or returning the email. You are then instructed to delete the information from your computer. Thank you for your cooperation.