

From: [Gene Pittman](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 28, 2014 5:00:08 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Pollock Employees Credit Union which serves Pollock Paper Distributors and a few other paper and packaging companies. We have 1,125 members and \$4,828,336.39 in assets. Pollock Employees Credit Union 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.

If our credit union is affected, it could cause our capital requirements to increase. That would be very difficult for us right now.

We are not sure that the new proposal is needed. I have not seen a good explanation as to why our current system needs to be changed.

This new proposal can cause confusion among the credit unions, and that is not needed right now.

By implementing this new proposal, we have a concern that it could keep us from being able to pay dividends to our members under certain circumstances.

We believe that more time is needed to provide an understanding to the credit unions as to why the change is needed and how it could affect many of our nation's credit unions.

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

Sincerely,

Gene Pittman
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Dallas, TX 75247