

Regulatory Comments

From: William Beardsley <no-reply@cuanswers.com>
Sent: Friday, April 17, 2015 12:57 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: William Beardsley
Michigan Business Connection LC

04/17/2015

Dear Mr. Poliquin:

Thank you for listening and addressing many of the improvement opportunities with the original RBC proposal. I appreciate many of the changes and while there are questions or concerns that remain for many, wanted to at least take a moment to voice concern over the CUSO risk weighting still assigned. The proposed 150% weighting makes no sense given the legal structure of CUSOs and the protections available to their owner Credit Unions. Additionally, it denies the reality that many if not most of the CUSOs have adequate resources and worths to protect themselves and their owners in the event of financial challenge. Please reduce the risk weighting to not greater than 100%, which by itself is excessive but is an understandable and rationale position to take.

A handwritten signature in black ink, appearing to read "W Beardsley". The signature is stylized and cursive, with a long horizontal stroke at the end.

William Beardsley
Michigan Business Connection LC