

## Regulatory Comments

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**From:** Michael Goad <no-reply@cuanswers.com>  
**Sent:** Sunday, April 19, 2015 8:15 PM  
**To:** \_Regulatory Comments  
**Subject:** Risk-Based Capital Comment

To: Regulatory Comments  
From: Michael Goad  
Notre Dame Federal Credit Union

04/19/2015

Dear Mr. Poliquin:

I would like to recommend that the NCUA truly believes that this rule will uncover the outliers and those credit unions that should operate with higher levels of capital than make this rule a test similar to those currently being performed like the 17/4. The OCC has numerous ratios and tests which they perform based upon call report information such as the canary ratios. These ratios are designed to uncover outliers and direct supervision in these areas to review.

We must stop the debate about the nuances of the rule and convince the NCUA, after outlining the substantial objections, that the modeling approach needs to be tested and tried in the examination process as a tool and then the results shared with the industry before suggesting that a model be embedded in a law.

I am an employee and member of a credit union and I am opposed to the revised Risk-Based Capital regulation. First, because although we are fundamentally different from banks, this regulation seeks to treat us the same. And second, because even the FDIC's Vice Chairman thinks a Risk-Based Capital approach is a bad idea! By implementing the rule, you won't serve our interests, our members', or the NCUSIF's; you'll only be creating a bigger mess for later. Please remove RBC from consideration. Thank you,

A handwritten signature in black ink that reads "Michael Goad". The signature is written in a cursive, slightly slanted style.

Michael Goad  
Notre Dame Federal Credit Union