

**From:** [Doug Bedner](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Doug Bedner – Comments on Proposed Rule: Risk-Based Capital (RBC2)  
**Date:** Monday, April 27, 2015 10:08:28 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Mr. Poliquin,

Thank you for allowing me the time to voice my opinion regarding the revised Risk-Based Capital Rule. As a devout advocate of the credit union movement I would like to comment on the potential upcoming Risk-Based Capital proposal in its updated form. I hope my comments will aid potential added improvements.

The current system works, credit unions came through the last Recession, the worst financial crisis since the Great Depression, just fine. Resource One has long demonstrated consistent growth since it was originally chartered, serving over 50,000 members. Although I believe NCUA has taken steps in the right direction to improve the original capital risk proposal, its revised format still seems to have flaws in its current state.

Credit Unions have survived various economic downturns, such as the last Recession. Why is more capital needed, if during the Great Recession, credit unions proved that the movement had adequate capital? The excess capital will come at the expense of our members. Additionally, the National Credit Union Administration has not demonstrated problems related to current prompt corrective action (PCA) regulation, other than a few isolated incidents. Credit unions have long positioned themselves to be able to withstand economic hardships. The RBC2 proposal is hurting instead of helping the financial health of credit unions.

NCUA has improved the risk weights for the revised Risk-Based Capital (RBC2) proposal from the original draft (RBC1). The risk weights remain high for both CUSO investments and mortgage servicing, which could affect a credit union's ability to own and operate in these areas. NCUA needs to consider lowering the risk weights for CUSO investments (150%) and mortgage servicing assets (250%).

I respectfully ask the NCUA to carefully review the proposed revised rule further, to either eradicate or alter certain guidelines for the development of all credit unions. Thank you again for allowing me the opportunity to convey my comments concerning the revised proposal.



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