

Regulatory Comments

From: REBA HAYES <no-reply@cuanswers.com>
Sent: Monday, April 27, 2015 10:17 AM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

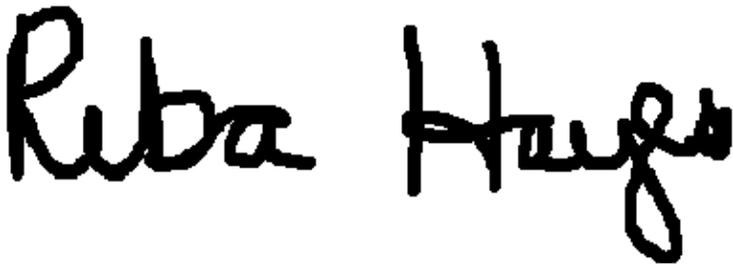
To: Regulatory Comments
From: REBA HAYES
NOTRE DAME FEDERAL CREDIT UNION

04/27/2015

Dear Mr. Poliquin:

I believe the revised RBC rule penalizes credit unions for specific activities such as real estate lending, member business lending, and credit unions chartered to assist the un-bankable by placing a capital tax on the resulting assets of low income or poor credit lending. We believe the end result will be thousands of homogenous balance sheets in 2025 that you can easily understand from a supervisory perspective. However, this current risk posture of the NCUA cannot fail but to lead credit unions to shy away from diversity or cooperative reason for the charter and field of membership. The end result of this rule will ultimately force credit unions into potential areas of investment and lending that the credit union lacks experience with or create industry wide concentrations that could be impacted by similar economic variables. In and of itself, this rule creates more risk than it proposes to control.

I am a member of a credit union and I am opposed to the revised Risk-Based Capital regulation. The proposed rule's one-size-fits-all approach treats our credit unions as if they were banks, ignoring the fundamental differences in structure and ownership. Don't take the easy road to governance by copying the banking industry-treat my credit union like a credit union. Thank you,

A handwritten signature in black ink that reads "Reba Hayes". The letters are cursive and somewhat stylized, with a large 'R' and 'H'.

REBA HAYES
NOTRE DAME FEDERAL CREDIT UNION