

From: [Karen Sorensen](#)
To: [Regulatory Comments](#)
Subject: Risk-Based Capital Comment
Date: Thursday, February 05, 2015 1:39:36 PM

To: Regulatory Comments
From: Karen Sorensen
CU*Answers

02/05/2015

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.



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