

From: [Lisa Smith](#)
To: [Regulatory Comments](#)
Subject: Risk-Based Capital Comment
Date: Tuesday, February 10, 2015 10:27:40 AM

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From: Lisa Smith
CU*Answers

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Dear Mr. Poliquin:

As mentioned by the Hon J. Mark McWatters, the NCUA cannot just “piggyback” on to the FDIC unless they have the authority from Congress to do so. The plain language of the statute contradicts the NCUA’s interpretation. After all, if the NCUA was to be given the same PCA authority as the FDIC, Congress could have done exactly that. The clear intent of Congress was to create a separate system for our industry, and the NCUA must operate within those confines.



Lisa Smith
CU*Answers