

Regulatory Comments

From: Annalyn Hawkes <no-reply@cuanswers.com>
Sent: Thursday, February 26, 2015 5:16 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: Annalyn Hawkes
Xtend, Inc.

02/26/2015

Dear Mr. Poliquin:

Thank you for opening further discussion on RBC2. I have selected the following comments as those which I feel speak very well to my thoughts regarding this updated version of your initial RBC rule.

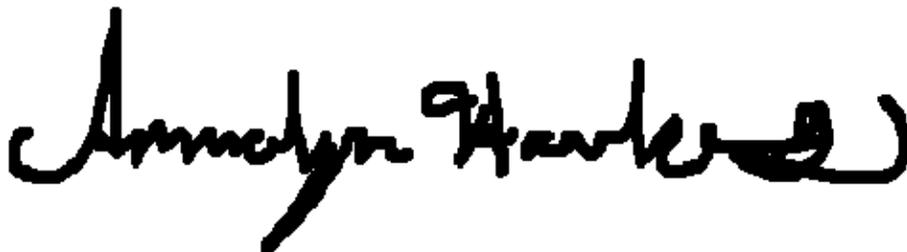
First -

"History has shown that the cooperative model of credit unions is a successful one. The diverse nature of our charters has meant that despite little capital—except member good will and loyalty—the forefathers and current stakeholders of the industry have built the second largest financial system in America today, serving close to 40 million households with savings of nearly \$1 trillion. The proposed rule will serve to hinder that diversity by placing credit unions into more general categories. Protect the true nature of credit unions by ending this rule so we can celebrate the charters that made this industry possible, from the \$60 billion Navy FCU to any of the \$1-5 million “family” credit unions. From the farming communities of South Dakota serving family farms with loans to the taxi drivers from NYC to San Francisco. From the raw recruit in San Diego to the forward deployed military professional in Diego Garcia, Korea, or Afghanistan. From the auto worker in Detroit or Tennessee to the high tech communities of Silicon Valley."

And finally -

"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."

Thank you,



Annalyn Hawkes
Xtend, Inc.