

Regulatory Comments

From: Jim Vickers <no-reply@cuanswers.com>
Sent: Friday, February 27, 2015 3:08 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: Jim Vickers
Western Districts Members CU

02/27/2015

Dear Mr. Poliquin:

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.

A handwritten signature in black ink that reads "Jim Vickers". The signature is written in a cursive style with a large, sweeping initial "J" and a distinct "V".

Jim Vickers
Western Districts Members CU