

## Regulatory Comments

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**From:** Steve Shaw <no-reply@cuanswers.com>  
**Sent:** Wednesday, March 11, 2015 11:09 AM  
**To:** \_Regulatory Comments  
**Subject:** Risk-Based Capital Comment

To: Regulatory Comments  
From: Steve Shaw  
CU\*South

03/11/2015

Dear Mr. Poliquin:

I believe the revised RBC rule creates more risk than it proposes to control.

The 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. The end result of this rule will ultimately force credit unions into potential areas of investment and lending that the credit union lacks experience and/or create industry wide concentrations that could be impacted by similar economic variables.

A handwritten signature in black ink that reads "Steve Shaw". The signature is written in a cursive, flowing style.

Steve Shaw  
CU\*South