

## Regulatory Comments

---

**From:** Chris Butler <no-reply@cuanswers.com>  
**Sent:** Monday, March 23, 2015 4:42 PM  
**To:** \_Regulatory Comments  
**Subject:** Risk-Based Capital Comment

To: Regulatory Comments  
From: Chris Butler  
Community Credit Union

03/23/2015

Dear Mr. Poliquin:

Based on my close involvement with this in the first proposal and reading the comments and opposition letters for this second proposal, it seems to me there still is no good justification for the change. Yes, Chair Matz says you need to do this because Congress said. But there is it still no quantifiable justification for the risk weightings. When I explain to my board that a CUSO investment will be weighted at 150% they ask me how could we loose more than we invest. I can't explain it, can you?

I hope the NCUA board will start taking some common sense approach to it's decision making as brought forth by the newest NCUA board Member McWatters.



Chris Butler  
Community Credit Union