

From: [Sam Taft](#)
To: [Regulatory Comments](#)
Subject: NCUA Risk-Based Capital Proposal Comment
Date: Wednesday, March 25, 2015 8:33:28 AM

To quote Board Member McWatters: “If Congress had intended a two tier risk-based capital system, the drafter would not have included the words “to be adequately capitalized’ in the FCU Act. The inclusion of this phrase indicates that Congress intended to limit the risk based capital standard to a single-tier system, and any attempt by the NCUA board to create a two tier risk based capital system simply contradicts what is written in the law... it is truly ironic and disconcerting that the Board would seek to raise the risk-based capital requirements for credit unions without also affording the system with a workable means by which to raise supplemental capital for risk-based purposes.”

Please withdraw the rule.

Respectfully,
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