

## Regulatory Comments

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**From:** Doug Burke <no-reply@cuanswers.com>  
**Sent:** Thursday, April 02, 2015 5:12 PM  
**To:** \_Regulatory Comments  
**Subject:** Risk-Based Capital Comment

To: Regulatory Comments  
From: Doug Burke  
CU Service Network

04/02/2015

Dear Mr. Poliquin:

Our CUSO was started over 20 years ago to provide collaborative services in ATM and Shared Branching Networking. Our organization has grown to serve over 130 credit unions in 7 states, providing cost effective products and services to both our owners and non-owners. Because of the leadership of our current and past credit union board members, our organization has been very successful and has built significant capital for future R&D initiatives. Because of the proposed regulation, our credit unions would be punished for owning and participating in a successful organization. In order to minimize the impact of the regulation, excess earnings would be given back to the credit unions, reducing their CUSO investment exposure. The result would be a lower capital standard but it would also reduce the future services from the credit union as the R&D funds have been eliminated.

The future of credit unions will be challenging enough, but add the burden of a regulation that discourages cooperation, the future is not bright. I strongly encourage you to reduce the CUSO capital percentage to 100%!



**CEO**

Doug Burke  
CU Service Network