

**From:** [Dean Pielemeier](#)  
**To:** [Regulatory Comments](#)  
**Subject:** RBC2 Comment  
**Date:** Friday, April 03, 2015 3:15:36 PM

---

April 3, 2015

Gerard Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428

**Subject: Proposed Risk Based Capital Rule**

Dear Mr. Poliquin:

While revisions in the right direction have been made, the question still remains, why is this proposed rule necessary? Would it have kept those credit unions that failed during the most recent recession from having failed? Is the rule for the good of the whole, or is it to push a few more credit unions out of existence?

The burden of the proposed rule on the industry, I believe, is much more than the anticipated benefit. There is already an undue regulatory burden imposed on credit unions. To continually increase this burden is not strengthening credit unions but rather increasing the cost of complying with these regulations, thus reducing the net income which obviously leads to reduced capital. This is especially true for smaller credit unions.

While one can appreciate what is attempting to be accomplished, I believe the mark has been missed.

Respectfully Submitted,



Dean Pielemeier  
President & CEO

[Dean Pielemeier](#) | President/CEO | Abbey Credit Union | 800 Falls Creek Dr | Vandalia, OH 45377 | 937.898.7800 x 106 (Phone) | 937.898.7803 (Fax) | [dpielemeier@abbeycu.com](mailto:dpielemeier@abbeycu.com)



The information contained in this electronic mail message may be confidential and protected information intended only for the use of the individual or entity named above. As the recipient of this information you may be prohibited by State and Federal law from disclosing this information to any other party without specific written authorization from the individual to whom it pertains. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, dissemination, distribution, copying, or action taken in reliance on the contents of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and destroy the message and its attachments.