

Regulatory Comments

From: Ann Goodwin <no-reply@cuanswers.com>
Sent: Wednesday, April 08, 2015 3:19 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: Ann Goodwin
Community Credit Union

04/08/2015

Dear Mr. Poliquin:

History has shown that the cooperative model of credit unions is a successful one. The diverse nature of our charters has meant that despite little capital—except member good will and loyalty—the forefathers and current stakeholders of the industry have built the second largest financial system in America today, serving close to 40 million households with savings of nearly \$1 trillion. The proposed rule will serve to hinder that diversity by placing credit unions into more general categories. Protect the true nature of credit unions by ending this rule so we can celebrate the charters that made this industry possible, from the \$60 billion Navy FCU to any of the \$1-5 million “family” credit unions. From the farming communities of South Dakota serving family farms with loans to the taxi drivers from NYC to San Francisco. From the raw recruit in San Diego to the forward deployed military professional in Diego Garcia, Korea, or Afghanistan. From the auto worker in Detroit or Tennessee to the high tech communities of Silicon Valley.

The NCUA and the credit union industry would both be served better if the formulas and risk weights within RBC were not given the force of law. Do not force my credit union to institute changes both potentially drastic and unwarranted in our balance sheet to meet these arbitrary weights.

I am a member of a credit union and I am opposed to the revised Risk-Based Capital regulation. Capital rules like the one NCUA is proposing have not worked in the past and proven to be more harmful than beneficial. What's more, they will simply add additional bureaucracy and regulatory burden on my credit union, which will hamper its ability to provide me and my fellow member-owners with high quality services, low interest rates, and greater dividends. Don't hurt my credit union—take Risk-Based Capital off the table. Thank you,

A handwritten signature in black ink, appearing to read 'Ann Goodwin', written in a cursive style.

Ann Goodwin
Community Credit Union