

From: [Dana Morris](#)
To: [Regulatory Comments](#)
Subject: Risk-Based Capital Proposed Regulation
Date: Friday, March 21, 2014 9:44:04 AM

[This message was sent securely using ZixCorp.](#)

March 21, 2014

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke St.
Alexandria, Virginia 22314-3428

Dear Secretary Poliquin:

I am writing to convey my disapproval of the proposed regulation to increase capital standards for credit unions. The NCUA proposed rule indicated the new method for computing risk-based capital measure is more consistent with “the risk-based capital measures used by Other Banking Regulatory Agencies”. Unfortunately your proposal requires *higher* capital standards than those that are imposed on banks. The logic behind such a requirement is elusive at best. Credit Unions were not culpable for the financial crisis and should not be bound by a higher capital standard than those that were. Credit unions should be allowed to continue to serve their members’ mortgage needs instead of sending them on to the aforementioned offenders due to the fear of being labeled “risky”.

I am concerned with the proposal to allow the NCUA to assess additional capital requirements (above well-capitalized levels) on an individual basis. Rules are established to be followed. If they can be changed on a case-by-case basis, are they still rules?

I urge you to amend the proposed regulation to make it commensurate with our financial competitors and to eliminate the NCUA’s unfettered ability to change the rules at will.

Dana Morris
Vice President, Information Technology
Greenville Federal Credit Union
T: 864.404.3110 | F: 864.263.4849



*** This electronic transmission may contain confidential and privileged material for the sole use of the intended recipient. If you are not the intended recipient, please contact the sender and delete all copies. Any review or distribution by others is strictly prohibited. ***

This message was secured by [ZixCorp](#)^(R).