

From: [Queen of Peace Arlington FCU](#)
To: [Regulatory Comments](#)
Subject: Daniel Morrisey - Comments on Proposed Rule: PCA – Risk-Based Capital
Date: Sunday, February 02, 2014 12:13:12 PM

To: NCUA Board

Although this proposed rule does not have direct applicability to us, as a small credit union, I seriously object to the NCUA action of making the online risk based capital calculator available to any and all. These displayed ratios, and the associated categorization of the risk based capital ratio, are based on a **proposed** rule. In addition, as is noted by NCUA, these calculations are based on NCUA's **estimates** from the call report data. These estimates may be quite different than the actual data for a credit union that would be used to accurately calculate the ratio in the proposed rule. In addition, any actual final rule may very well use quite different calculations.

Making this calculator available to the general public by NCUA, in my opinion, exposes credit unions of all sizes, even if the particular credit union is not even subject to the final rule, to unfair and unwarranted "Reputation Risk" if the displayed estimated ratio categorizes a credit union as anything less than "Well Capitalized". I urge NCUA to remove this flawed calculator from general public access.

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