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February 12, 2014

NCUA Board, Regulatory Comments
703-518-6319

Re: Comment on Risk-Based Capital Proposal

Dear Board:

While I certainly appreciate the NCUA trying to protect credit unions from some of the risks of lending, I propose that the regulation has unintended consequence of discriminating against homeownership. Credit unions that focus on single family, primary resident, local mortgages are not only fulfilling their mission, but are excellent custodians of the principle of safety and soundness. Losses on our mortgages are considerably less than any other loan type we offer. Plus, home loans bring a positive reputation value that your calculator can't factor.

Lending to lower income families can only be successful when they receive personal attention that a local credit union provides. I submit that any regulation that has any hint of requiring additional capital for the providing of home loans to the common family is destructive. Let's call it the risk-based capital of not lending.

Sincerely,

A handwritten signature in black ink that reads 'Tommy Cobb'. The signature is written in a cursive style with a large, looped 'T' and 'C'.

Tommy Cobb
CEO
Tuscaloosa Credit Union