

**From:** [Roberta Kreitz](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action ??? Risk-Based Capital Comment Letter  
**Date:** Friday, February 21, 2014 1:30:07 PM

---

Dear Secretary of the Board Poliquin,

I am writing on behalf of Ohio University Credit Union, which serves many SEGS in Athens County, including Ohio University. We have 24,000 Members and \$288 million in assets. OUCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

Given the fact that the credit union industry as a whole came through the great recession I am wondering why the need for this change at this time.

I understand that the NCUA has the ability to impose higher capital requirements on a case by case basis. I disagree with this, as it would be left up to the discretion of the examiner to make the determination.

I feel that several of the risk weightings are too high. For example the MBLs, the CUSO investments and the longer term investments weightings are excessive. Insured bank CDs pose no greater risk to capital because of an extended term.

I don't think the calculation provides any relief for a well-run credit union that manages risk accordingly.

I do not agree that NCUA would be able to restrict dividend payments, based on my previous concern of the examiner having the ability to assign a higher capital ratio.

It is my understanding the banks were given about three years to implement the changes to the risk-based capital. I feel credit unions deserve the same transition period.

Thank you for the opportunity to comment on this proposed rule and for considering our views on risk based capital requirements.

Sincerely,

Roberta Kreitz  
944 E State St  
Athens, OH 45701