From:	Karen Janoski
To:	_Regulatory Comments
Subject:	Prompt Corrective Action ??? Risk-Based Capital Comment Letter
Date:	Monday, February 24, 2014 2:40:07 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Greater Pittsburgh Police Federal Credit Union. We serve employees of the Pittsburgh Bureau of Police, Pittsburgh Public Safety Dept., members of the Fraternal Order of Police and multiple municipalities of Allegheny County, PA. We have 5864 Members and are $60,050,000 in assets. Greater Pittsburgh Police FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

We do not believe that NCUA should implement the new Risk-Based Capital Proposal because unlike the Banking Industry, the credit unions took care of the failed mortgage industry by paying for the corporate credit union losses through yearly assessments. We faced the worst possible environment in over 80 years and we took care of the problem without government tarp funds. We do not believe that the new capital proposal is necessary and we feel that NCUA should not intervene and strap more credit unions through higher capital requirements.

We believe that the changes that NCUA has already made to the corporate credit union industry and the changes made after the mortgage collapse have already placed credit unions in a better position.

If you are looking to impose higher capital, it should be for the credit unions that do MBLs, Commercial Loans, and possibly for Investments over 10 years.

NCUA also should not have a say in dividends that the credit union Board sets to pay their members. We believe that NCUA is overstepping what their intended purpose was meant to be.

It is the opinion of this credit union that NCUA should not implement a new Risk-Based Capital Rule and that NCUA should continue to conduct themselves with the current supervision and exam process. We corrected the worst scenario to hit credit unions in their lifetime, and we can do it again if that should occur.

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

Sincerely,

Karen Janoski, CEO
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