

From: [Bill Brooks](#)
To: [Regulatory Comments](#)
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NCUA needs to reconsider the increased capital requirements based solely on amount of mortgage balance. Credit unions have the unique responsibility to act in a fashion that makes more available to members of modest means. The increase in capital requirement will only lead to less available to members of modest means. This increase in capital acts as a tax across the board with out consideration to other issues involved in mortgage lending.

There is a big difference in home mortgage lending and house mortgage lending. It is with regret that many people in the last bubble were taking out mortgages for the purpose of buying a house and not a home. They were acting like short term investor who had no real long term interest in doing most to the living and dying in a stable community supported by home ownership which tends to be the greatest wealth building vehicle in history. This regulation as written fails to promote home ownership and reduce speculative house ownership.

Yes , there was a loss of core lending principles for home lending on the part of some lender, but the bad actors did not seem to be individual credit unions. It is suggested that NCUA's regulatory efforts would be better served attempting to understand the tremendous wealth developing vehicle for individuals that home ownership brings to the member and encouraging expansion of lending that encourages proper home lending and eschews expanded speculation in house lending.

The present form of the regulation destroys potential home ownership and wealth development. The regulation should be designed to discourage the problems cause by speculative house lending. This is very challenging subject, and it takes an understanding of wealth development buy prudent and provident home lending. This cookie cutter regulation as proposed only harms those that NCUA and the credit unions they regulate are charge to help.

Thank you for this opportunity to comment.

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