

From: DGMUnity@aol.com
To: [Regulatory Comments](#)
Subject: Risk Based Capital Proposal
Date: Monday, March 17, 2014 12:59:49 PM

regcomments@ncua.gov

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke St.
Alexandria, Virginia 22314-3428

Dear Secretary Poliquin,

Unity Credit Union, Warren, Michigan #62362 writes in opposition to proposed regulation concerning the Risk Based Capital Proposal.

“The mission of the NCUA is to facilitate the availability of credit union services to all eligible consumers, especially those of modest means, through a safe and sound credit union system.” So states the NCUA webpage. Yet this proposed regulation is exactly the opposite of what is described in your “mission statement”.

NCUA certainly steps away from its avowed mission if it were to allow this proposed regulation to go ahead without serious amendment.

Are we to believe that the higher standards, imposed on credit unions relative risk ratings on mortgage lending to be a facilitation of available services to eligible consumers? Hardly because, as the Board already knows, the risk ratings imposed by this proposed regulation would set standards higher than our competitors and due to their punitive nature, discourage credit unions from participation in members oriented mortgage activity and turn that activity to our competitors.

In the interest of simple equity the risk based requirements should not exceed the requirements imposed on our competitors by their regulators.

Another troubling aspect of the proposal is it's allowance of "additional authority" to impose even higher capital requirements than imposed by the proposed new regulation. Either write the rules in a fashion that is distributed equally on the governed or dont write anything at all. We find it astounding that when people write rules they give no consideration to the possibility of abuse even if they are currently well meaning. Administrations change and the good intent of todays writers and rulemakers (hopefully) can change as new people are placed in charge. To allow subjectivity on a matter this serious is to invite disaster.

We believe it is in the best interests of NCUA and Credit Unions and their members to take a careful look at what NCUA proposes and act to level the field and eliminate the subjectivity referred to in this response

Dennis Moriarity, CEO

Unity Credit Union, Warren, MI 48092