

From: [Teresa Jones](#)
To: [Regulatory Comments](#)
Subject: NCUA Risk Based Capital Proposed Regulation Comment Letter
Date: Wednesday, March 19, 2014 2:25:27 PM

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Dear Secretary Poliquin:

After reading the proposed regulation concerning Risk Based Capital, I am troubled at the negative effect this will have on all credit unions and their members.

Credit Unions did not create the financial crisis and have emerged from it stronger than ever. Banks will not have their capital requirements increased, but credit unions will. Why would the NCUA be requiring regulation on institutions that were not the cause? Why would the limit for a credit union be higher than a bank? At the very least, a credit union's requirements should not exceed what a bank is required to retain in capital.

What is the NCUA trying to gain by increasing the capital requirements? Imposing these higher capital limits will only create a difficult environment to serve our members. Many credit unions will be unable to survive and will be forced to close their doors to the members they serve. Credit Unions will slow the growth and the potential to help members. Where will those members turn to get affordable credit? Where will they turn for cost-effective account services? Credit Unions are working to improve the financial situations of our members. Increasing the capital requirements will only reverse the positive effect that credit unions have on the economy.

The proposal also includes the allowance of the NCUA to impose higher standards than the proposed regulation requires on a case-by-case basis. All subjective language should be eliminated so that it will not lead to abuse or misconstrued interpretation in the future. Write the regulation to be clear and concise for all to apply equally.

In the best interests of credit unions and their members, please amend this proposed regulation to equal our competitors and eliminate the subjectivity of the response.

Thank you,

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