

From: [Deborah Trotter](#)
To: [Regulatory Comments](#)
Subject: Risk Based Capital
Date: Wednesday, March 19, 2014 6:00:38 PM

Dear Secretary Poliquin,

Charlotte Fire Department Credit Union writes in opposition to the proposed regulation concerning the Risk Based Capital Proposal.

From First Mortgages, to Member Business loans to Investments, why are credit union regulators requiring more capital than our banking competitors regulators? We refuse to believe our member owners carry any higher risk than those banking at other financial institutions nor should they be penalized for doing business with a member-owned credit union. Should a credit union borrower be required to pay a higher capital tax, than a bank borrower? And requiring more capital for credit unions investing in low risk investments...why? These capital taxes on credit union members are unreasonable and unfair.

These additional capital requirements appear to be more punitive than functional. We believe that it is in the best interest of NCUA and Credit Unions and the Members for this proposed rule to be revamped to more reasonable levels.

Deborah Trotter
President/CEO
Charlotte Fire Department Credit Union
2100 Commonwealth Avenue
Charlotte, NC 28205
704-375-3950