

**From:** [Anne Heggelund](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Thursday, March 20, 2014 1:30:15 PM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of Marathon County Employees Credit Union, which serves Government Employees and their families. We have 2,452 Members and \$22 M in assets. I started here in May 1985. At that time we were \$600,000 in assets. Marathon County Employees Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

How would your credit union be affected by the proposal? While we are not at \$50 M in assets yet, we hope to grow the credit union to that asset size in the next ten years. So, yes we would be effected and the effect would be that we would have to balance our assets to meet the regulators needs, not our members needs. We need to grow to survive. It is difficult being a small credit union with todays heavy compliance burden.

Do you agree this new proposal is necessary? No.

Do you agree NCUA should be able to impose higher capital requirements on credit unions on a case by case basis? No, this leaves it open to interpretation. The person doing the interpretation has too much power.

Do you agree with the risk weightings for:

- MBLs: No, weighting is too high
- Mortgage Loans, Not sure
- Longer-term investments, Not sure
- Consumer loans, Yes
- CUSOs Investments and Loans, Not sure
- Others (Please identify) Not sure

Should the NCSUIF deposit be excluded from the calculation of RBC ratios? No

Should goodwill be excluded from the calculation of the RBC numerator? Unsure as I am not familiar with what is included in "goodwill"

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide? Not sure.

Do you agree with NCUA's implementation time line? No, If not, how much more time should credit unions be provided? At least two years as it will have a great impact on long range planning.

We are here to serve our members financial needs. If it is mortgage products that they need, then we should be able to give them what they need. This proposal would create strong incentives to not make mortgages. We would not be serving our members needs. Give the credit unions some credit on the fact that they do know their members and their markets.

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

Sincerely,

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