

From: [Floyd Rummel, III](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, March 26, 2014 5:30:32 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Northern Hills FCU, which serves the counties of Meade, Butte, Lawrence and Pennington in South Dakota. We have 9,000 Members and 78M in assets. Northern Hills FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

Our credit union would be negatively affected by this proposal we would go from well capitalized to only adequately capitalized if the rule becomes effective in its present state.

We do not feel this rule is even necessary. We believe that you should concentrate on a secondary capital rule first or at the least in conjunction with this proposed rule.

We also do not believe that NCUA should be able to place certain requirements for capital on a case by case basis.

We believe that this proposal should be scrapped entirely and completely rewritten in conjunction with a secondary capital rule.

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

Sincerely,

Floyd Rummel, III
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