

From: [Kelly Waggoner](#)
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 El Reno RIL Credit Union, which serves Canadian County, Oklahoma. We have 3,700 Members and 45,068,020 in assets. El Reno RIL 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.

I do not understand the need to change computing our risk based capital ratio? We don't see the Credit Union failures on an up rise and we keep telling ourselves that we are different from banks but yet, we want to use approaches that regulate us like a bank? This just doesn't make sense. When I speak to our congressmen, they often ask me, "Do you want to be treated like a bank, than we will regulate you like a bank." If we want to keep our distinction, then why change a regulation?

Now, I'm also looking at the impact this could have on my credit union in the future. While I'm currently at 45 million in assets, the regulation doesn't apply to me...now. As I want my credit union to continue with growth possibilities, do I think it's manageable to go from 7.30% to 11.93% while increasing 5 million in assets?

This is a tough environment. We are constantly being re-regulated over and over again. I could see if there was an increase in credit union failures, that a change would be needed but as I see it, it looks as if this could hurt the credit unions struggling to stay well capitalized and place them in a failure situation.

I hope and pray that this regulations is more heavily scrutinized as I do not see this as a positive change for our institution.

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

Sincerely,

Kelly Waggoner
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