

**From:** [Henson, Jan](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk Based Capital  
**Date:** Thursday, April 03, 2014 1:01:42 PM

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April 3, 2014

Dear Secretary Poliquin:

It is too much. Please ask the Board to consider the fact that raising the Capital Reserves requirements from 7% to 10.5% is a huge leap for a single adjustment. To increase the rate by 50% in one single move is a bit unfair to those credit unions who not at or even close to such a requirement.

Our SEG based credit union has \$2.3 million in assets. This sudden change would adversely affect our business as well as many others. It would likely cause many credit unions to fall under stricter observance by examiners as well. In turn, this would increase the costs to the NCUA. We have paid thousands to Stabilization in the past few years; money which would have gone toward raising our reserves. To now ask us to raise our reserves is just too much!

As I understand the financial debacle, the lack of regulations on derivatives is the cause of the problem. And putting the squeeze on 1-2 employee credit unions could lead to more consolidation causing the "small" credit unions (our grass roots) to completely disintegrate. This is not right!

With no alternative and a raise must occur, please consider a gradual increase over several years.

Best regards,

Janice F. Henson  
Board Chairperson  
Bothwell Hospital Employees  
Credit Union

660-827-9447  
[jhenson@brhc.org](mailto:jhenson@brhc.org)

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