

From: [Jenny Gross](#)
To: [Regulatory Comments](#)
Subject: New RBC Rule
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Why is there a discrepancy between credit unions and banks when it comes to the benchmark designated for delinquent loans? It appears that loans are considered delinquent after 90 days for banks and 60 days for credit unions. This discrepancy gives people the false impression that credit unions are weaker and experience more delinquencies than banks, which is absolutely not true.

Thank you,
Jenny