From:	K D Johnsen
To:	_Regulatory Comments
Subject:	Prompt Corrective Action Risk-Based Capital Comment Letter
Date:	Tuesday, April 15, 2014 10:40:52 AM

Dear Secretary of the Board Poliquin,

I am writing to tell you as a credit union member that the proposal is ill-advised and prepared. Credit unions were not the cause of the great recession but these measures you propose act as if they were. We are not profit driven and we don't take the risks that banks so the level of
NCUA's proposal would increase the amount of capital that would be risk control does not have to be so draconian.

The proposal would reduce by about $7 billion the buffers that credit unions currently hold above the well-capitalized requirements. This means credit unions would need to cut back on mortgages and business loans to raise their risk-based capital ratios, or raise loans rates and fees. They also may need to forego others services and may be required to reduce deposit interest rates to boost net income to raise capital.
The proposal would be particularly burdensome, and impose unnecessary increases in capital considering credit unions already have high basic leverage requirements, and rely on retained earnings to build net worth.

You need to go back to the drawing board and revise these proposed rules to take into account the industry you are regulating - the rules seem to have been developed by a banker happy to unnecessarily burden the completion.

Sincerely,

K D Johnsen
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