

Submitter Info

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Public Comments on Prompt Corrective Action; Risk-Based Capital: =====

Title: Prompt Corrective Action; Risk-Based Capital
FR Document Number: 2014-01702
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Submitter Info:

First Name: Michelle

Last Name: Troha

Comment: I am writing on behalf of [your credit union name], which serves [your field of membership]. We have [number] Members and [dollar amount] in assets. [Your credit union name] appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

How would your credit union be affected by the proposal "

Do you agree this new proposal is necessary"

Do you agree NCUA should be able to impose higher capital requirements on credit unions on a case by case basis"

Do you agree with the risk weightings for:

- ? MBLs
- ? Mortgage Loans
- ? Longer-term investments
- ? Consumer Loans
- ? CUSOs Investments and Loans
- ? Others (Please identify)

Should the NCSUIF deposit be excluded from the calculation of RBC ratios"

Should goodwill be excluded from the calculation of the RBC numerator"

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide"

Do you agree with NCUA's implementation timeline" If not, how much more time should credit unions be provided"

Do you have other concerns with the proposal" Please explain.

Summary of your position:

[Write the summary of your position here.]

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

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