

**From:** [Roberta Kreitz](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Friday, April 18, 2014 12:10:55 PM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of Ohio University Credit Union, which serves a large portion of Athens County, Ohio. We have 23000 Members and \$295M in assets. OUCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

I feel the idea behind risk-based capital is solid. However, I do not agree with the higher capital requirements of some asset categories. Additionally, I think the proposal should mirror the capital requirements of the banks. Credit Unions came through the recent economic downturn fairing much better than some of the banks.

I also disagree with the use of higher risk weights on long-term assets. The risk to capital would not change because of the term of an asset. The term would impact the interest rate risk, which should not be a factor in the risk-based capital calculation.

I do not agree that the NCUA could impose larger capital requirements on credit unions on a case by case basis. Too many times we've heard about examiners not acting in the best interest of the credit union. Or making decisions based on something other than the facts. Allowing this to happen could be detrimental to some credit unions. And, do the banks allow this?

I feel that credit unions should be given an adequate amount of time to implement the new requirements, mirroring what the banks were allowed.

I feel that growth in the credit union industry could be hampered if the proposal is enacted as it stands today.

In summary, I would say that I agree with the basic idea of risk-based capital. But the current proposal has many flaws, some of which were mentioned above. Please listen to credit unions, and make the necessary changes to fix this proposal.

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

Sincerely,

Roberta Kreitz  
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