



New Mount Zion Baptist Church Credit Union  
P. O. BOX 742256 DALLAS, TX 75374  
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April 23, 2014

MR. GERARD POLIQUIN  
SECRETARY OF THE BOARD  
NATIONAL CREDIT UNION ADMINISTRATION  
1775 DUKE STREET  
ALEXANDRIA, VA 22314-3428

Re: New Mount Zion Baptist Church Credit Union (NMZCU) Comments on Proposed Rule:  
PCA – Risk-Based Capital

Hello Mr. Poliquin:

This letter is to express the views of NMZCU regarding the recent NCUA proposal on PCA – Risk-Based Capital. NMZCU is located in Dallas, Texas and our FOM consists of the church congregation, community, church employees, and their families. NMZCU felt compelled to comment on this issue even though the proposal claims to apply only to federally insured credit unions with more than \$50 million in total assets. After reading the proposal, we believe it will affect “all” federally insured credit unions.

First, NMZCU has been a chartered credit union for 14 years. We have helped hundreds of our members; however, according to the new proposal, we are adequately fit to be in business because over these 14 years, our average net worth has been 8.02 percent. Per the new proposal page 11191, Table 4 – Proposed Capital Categories, we would be considered “Adequately Capitalized” – not good. This has upset our staff, board of directors and several members who are in the financial arena. This would send us out-of-business because our average net worth is 8.02 percent.

Second, just reading through page 11192, Section 702.103, it is clear to us that credit unions under \$50 million are not important enough to measure. Maybe you did not notice that even though they hold approximately 94 percent of the total credit union system assets, they only represent about 1/3 of the total number of credit unions. Meaning that small credit unions outnumber them and bring a lot to the industry. Therefore, we ask that you stop this proposal.

Next, page 11209, Paperwork Reduction Act and Total Estimated Annual Burden. For a two-person credit union, this can easily end up more than the 122 hours that you guesstimated for

NMZCU – *Serving Members Since June 2000*

Jodie Robinson  
Chairman

Iris R. Netters  
Manager





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“non-complex credit unions”. Both small and large credit unions can be “complex” or “non-complex”. The complexity has nothing to do with size. Now, let us look at the guess-timated 122 hours for a two-person credit union. That can be quite a workload increase. In addition, we are not even really addressing much on the paperwork reduction act. Because just the policy updates would be enough. We also read on page 11209 under the paperwork reduction act that “NCUA does not believe there will be any new burdens associated with this requirement.”

Additionally, we do not like what page 11194 and 11203 have to say either. We would never end this letter if we went into details, because each page has an insult and workload inflation. What we want is for you to stop trying to turn us into banks. We know that banks will have five years to comply but we (credit unions) would only have eighteen months. Another clear case of NCUA not working for credit unions and not having credit unions’ best interest at heart.

Thank you for your time. If you have any questions or concerns, please give us a call at 214.349.7613 x243.

Thank You,

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