

**From:** [Ryan Miller](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Tuesday, April 22, 2014 3:40:52 PM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of Brassies Credit Union, which serves the employees and family members of Lee Brass Foundry. We have 800 Members and \$7,000,000.00 in assets. Brassies Credit Union 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? We feel our membership would be limited by auditors that could offer their opinion on how our net worth was calculated. By requiring higher reserves our credit union field of membership would become even more under-served.

Do you agree this new proposal is necessary? I agree that net worth and capital requirements are important but I feel like anytime you allow someone's opinion to come into play as far as required reserve balances, you allow an unequal playing field and personally in my opinion you open up an opportunity for fraud. If I were to pay off my examiner to declare that I needed to keep a lower reserve balance than my competitor, then that would constitute fraud. This fraud can be prevented by keeping the old hard and fast rule in place.

Do you agree NCUA should be able to impose higher capital requirements on credit unions on a case by case basis? As stated above I feel like imposing this rule on a case by case basis is unfair and creates more opportunities for fraud within the banking system.

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide? I do not agree with the payment of dividends being restricted. This is micromanagement by the government at it's finest.

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

Sincerely,

Ryan Douglas Miller  
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