

**From:** [Lgray](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Proposed Reg Prompt Corrective Action - Risk Based Capital  
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When I see my fellow peers and Chairman of various credit union organizations banding together on a particular proposition I look into it in a bit more detail.

Although I can understand where the NCUA is coming from I would like them to give this proposal a lot more time and inspection, I see from past rules and regulations where, when done in haste, are in no-ones real interest.

If we are talking about a very few rogue credit unions not adhering to policy or creatively abusing the rules, then I really believe that is something that should be taken care of by their NCUA examiners, and if need be passed up the chain of command within the NCUA until that/they are brought back into line with most other credit unions.

To bring this rule in its present state, could cause even more undue stress on small, medium and large credit unions, just trying very hard to balance their books and be in the black and offer their members the services that they require in this day and age. It is a very rough playing field out there, and credit union's are the outsiders for the most part, playing by the rules and being pushed over by the big guys on their steroids.

So I implore you to please think this through very carefully and make no rash moves as I fear this could just make a bad situation even worse for credit union, who on the most part really do play fair and square and don't get much thanks for doing so.

Regards  
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