

From: [Donna Weston](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Thursday, April 24, 2014 3:50:52 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Bothwell Hospital Employees Credit Union which serves healthcare workers in the Sedalia, Missouri area. We have 822 Members and \$2.35 million in assets. Bothwell Hospital Employees 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.

First of all, I do NOT believe this proposed rule is necessary. If such a proposal were to go forward, I believe that the NCSUIF deposit should be included in the calculation of RBC ratios. And I do NOT agree that NCUA should be able to restrict dividend payments as the proposal would provide. Further, I do NOT agree with NCUA's implementation time line. This is too large of a percentage increase at one time. Any increase made should be gradual.

I feel that more and more the grassroots, "little guy" credit unions are being pushed out by increased regulation. In the past 15 years that I have been with Bothwell Hospital Employees Credit Union, I've seen the number of credit unions in both our state and nationwide DRASTICALLY reduced. I don't call that success. What has happened to "people helping people"?

To summarize my position, I feel that credit unions weathered the economic storm just fine and much better than banks, yet we are going to be penalized for it. This will make it even more difficult to compete with the big guys.

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

Sincerely,

Donna Weston
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