

**From:** [Tenesha](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk Based Capital Rule  
**Date:** Thursday, April 24, 2014 10:11:02 AM

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Good morning,

Recently, I have listened to discussion and read articles about the proposed Risk Based Capital rules for credit unions. If I understand correctly, the rule would require credit unions to deposit a higher amount for reserves than banks for some loans. If that's true then it seems to me that this could hurt credit unions in a couple of ways. First, to the "untrained eye" it would appear that credit unions make riskier loans than banks; and second, the additional funds earmarked for reserves would mean less money available for credit unions to lend to their memberships or pay out in interest.

I'm not sure I understand why the NCUA would want to penalize credit unions this way? During the recent mortgage crisis of the last few years, credit unions actually fared better than banks which is a testament to their more conservative lending practices. Seems to me, if the requirements are made different from banks, credit unions should have lesser reserve requirement, not a greater one.

Please reconsider putting rules in place that would negatively impact credit unions. Thanks you for your time and consideration.

Sincerely,

Tenesha Carter