

From: rzarubick@crccu.org
To: [Regulatory Comments](#)
Subject: Comments on Proposed Rule: PCA - Risk-Based Capital; RIN 3133-AD77
Date: Friday, April 25, 2014 6:57:16 PM
Attachments: [myLetter.pdf](#)

April 25, 2014

National Credit Union Administration
Gerald Poliquin, Secretary of the Board
1775 Duke Street
Alexandria, VA 22314-3428

RE: Comments on Proposed Rule: PCA - Risk-Based Capital; RIN 3133-AD77

Dear Gerald Poliquin,

I am writing on behalf of CRC Federal Credit Union, which serves the employees of three state correctional facilities in San Bernardino County, California. We have approximately 2,000 Members and 8.7 million in assets. CRC Federal 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.

I do not agree with this proposal. I am especially concerned with the stipulation that would allow an examiner to arbitrarily choose risk-based capital weights or minimum risk-based ratios for my credit union based on examiners findings. If my risk-based capital rating is dropped, I do not see a process/formula outlined in this new proposal that helps me determine how much more capital I must maintain. It feels as though the examiner is being given the power to manage the perceived risk of my credit union.

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

Sincerely,

Rosie Zarubick
CEO
C.R.C. FCU

cc: CCUL