

From: [Christine Moczynski](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Thursday, May 08, 2014 1:00:53 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Prime Financial Credit Union which serves over 20,000 members in southeast Wisconsin with Total Assets of over \$105 million. Prime Financial 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.

Prime Financial Credit Union has worked hard over the past 4 years to raise our Net Worth Ratio from 3.10% to just over 7%. Now that Prime Financial Credit Union has achieved Well Capitalized status, we can focus on providing services essential to the financial well being of our members.

Under the new proposed rule however, Prime Financial Credit Union would need to continue to make sacrifices to services in order to build additional capital required under the new rule to maintain that well capitalized status. Prime Financial Credit Union received its low income designation with over 72% of its membership qualifying. It is essential that management can focus on serving our members and providing loan products to improve their financial well being.

Given the impact of the recent recession, Prime Financial Credit Union has proven that the current capital requirements were sufficient to weather the storm.

We have concern with the proposed rule that the NCUA has discretion to subjectively raise capital requirements. We have experienced some inconsistencies with examiners over the past years. The ability subjectively increase requirements is concerning.

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

Sincerely,

Christine A. Moczynski
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