

From: [Kelly Mitchell](#)
To: [Regulatory Comments](#)
Subject: Risk Based Capital Comment
Date: Thursday, May 08, 2014 1:32:05 PM

To whom it may concern,

I am writing on behalf of TEXAR Federal Credit Union. Our credit union would be negatively impacted by the proposed rule. Our net worth ratio would decline by 101 bps and we are not considered a complex credit union. We are exploring new revenue streams as margin compression continues and expenses rise. The CUSO weighting is excessive regardless of the type of CUSO which doesn't seem appropriate. I am also concerned that the rule is geared more for the banking system than the credit union system as we have a very different capital structure than they do. We are in a rural area and many of our members do not qualify for secondary market mortgages because of acreage restrictions or appraisals that don't meet the narrow secondary market guidelines. The rule would limit credit to our members seeking mortgages.

It is my belief that if the rule is not substantially changed or eliminated there will be significant damage done to our industry.

Respectfully,
Kelly Mitchell

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