

From: [Kevin Yaeger](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Thursday, May 08, 2014 1:00:52 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Post Office Credit Union, which serves anyone working or residing in Dane County, Wisconsin. We have 3300 Members and \$38 million in assets. Post Office 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.

This new rule would require credit unions to hold over \$7 billion in additional capital. This for a system that withstood the worst financial crisis in 80 years.

Under the proposal, an examiner would have discretion to increase a credit union's individual risk-based capital requirement during an examination or supervisory assessment, based only on the examiner's subjective determination that the credit union need additional capital. Imposing higher capital requirements on credit unions on a case-by-case basis would give examiners far too much discretion and create too much uncertainty for credit unions. This rule, as written, will already rain competitive disadvantage and hardship on credit unions. To allow additional "just because I said so" authority for individual examiners compounds these effects.

I don't believe that the NCUA has adequately demonstrated the need for such a rule, and urge them to abandon its adoption.

Should the NCUA decide to go forward with implementation, credit unions should be given ample time to restructure their balance sheets to meet the standards in the final rule. I believe that the rule should be phased in over a period of two to four years.

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

Sincerely,

Kevin A. Yaeger
406 S Franklin St
Verona, WI 53593