

**From:** [Thomas Pinnow](#)  
**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 [your credit union name], which serves [your field of membership]. We have [number] Members and [dollar amount] in assets. [Your credit union name] appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

How would your credit union be affected by the proposal?

Our credit union will not be affected right now, but as we grow it could become an important issue

Do you agree this new proposal is necessary?

No, I feel credit unions have performed well, even through the financial crisis. It is a tough enough environment now and we do not need any additional regulatory burden.

Do you agree NCUA should be able to impose higher capital requirements on credit unions on a case by case basis?

No, I feel the current process is okay and that risky credit union can be dealt with in other ways.

Do you agree with the risk weightings for:

- MBLs
- Mortgage Loans
- Longer-term investments
- Consumer loans
- CUSOs Investments and Loans
- Others (Please identify)

Should the NCSUIF deposit be excluded from the calculation of RBC ratios?

Should goodwill be excluded from the calculation of the RBC numerator?

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide?

No, this would be an absolute disaster with member relations and serve to hurt the credit union. Plus, they may need to attract deposits to solve their problem. The NCUA should not be allowed to limit dividend payment. If they can't afford the dividend they should be merged or liquidated.

Do you agree with NCUA's implementation time line? If not, how much more time should credit unions be provided?

Do you have other concerns with the proposal? Please explain.

Summary of your position:

I am apposed to this proposal because I feel it is not necessary and will only serve to hinder the growth of credit unions.

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

Sincerely,

Tom Pinnow  
410 E Ogden St  
Jefferson, WI 53549