

**From:** [Chuck Bullock](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk-Based Capital Proposal  
**Date:** Friday, May 09, 2014 5:40:06 PM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of TECU Credit Union, which serves 16 counties in Kansas, including the Wichita MSA. TECU serves 8,000 members, with \$70 million in Assets. Please accept my appreciation for the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

TECU is actually one of the fortunate few credit unions that still maintains a well capitalized ratio, under the proposed guidelines. The concern that I have, however, is the adverse impact on our Capital cushion. In our particular case, it reduces that cushion by 102 basis points.

Navigating a small credit union in today's business and economic climate is certainly rewarding, but can be most challenging as well. We've worked hard to get where we are, and will continue to focus on the needs of our members, yet maintain a solid balance sheet and income statement.

To be honest, it concerns me to hear that we may be faced with increased minimum requirements and regulations, during a period where additional regs are already quite burdensome and expensive.

I can only request that alternative methods be considered before imposing higher capital requirements on our industry.

Thank you for the opportunity to comment on this proposed rule.

Sincerely,

Chuck Bullock  
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