

**From:** [David Meade](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [syashewski@cornerstoneleague.coop](mailto:syashewski@cornerstoneleague.coop)  
**Subject:** David Meade Comments on Proposed Rule regarding Risk-Based Capital  
**Date:** Friday, May 09, 2014 1:25:42 PM  
**Attachments:** [image001.png](#)

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Dear Gerald Poliquin,

Good Afternoon, I am writing this as Director of Operations for Capitol Credit Union and the thoughts and concerns expressed are mine alone and do not reflect those of the board of directors or CEO of Capitol Credit Union. Thank you for the opportunity to comment on this proposed rule.

As a young professional in the credit union industry I don't have the years of experience nor first-hand knowledge as some of my peers, so my perspective is one framed in the current economic climate. I started in the industry at the height of the financial crisis, many of my peers were disillusioned by big banks and wall street for causing a recovering economy to worsen. Risk is something inherent to any business transaction, as credit unions we should not be risk adverse but embrace proper risk management. Our members look to us as a solution for their financial needs that maybe they once qualified for prime rates but losing income, getting behind on their payments, etc. has caused them to look to credit unions for a fair rate. Are these loans any more risky? BASEL III is in the process of implementation for community banks ample time to adjust their capital accordingly. NCUA has proposed an 18 month finalization for credit unions. This timeline is for this puts a significant burden on smaller credit unions that don't have the man power to properly assess all the risk weights and then implement changes.

Risk based assessments should be a part of the overall health of the credit union, but it should be treated as a part not a complete indicator of the health of a credit union. I hope to continue my career in the credit union industry but some of the proposed rules would mean the stuttering of growth for smaller credit unions. Please rethink these proposals and listen to some of the other wonderful comments that explain better than I could how the risk weightings and other aspects hurt credit unions and our ability to function.

Thank you for your time,

**David Meade, CUCE**

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