

From: [Jennifer Schilling](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Friday, May 09, 2014 1:11:36 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Empower Credit Union which serves our SEG of Wisconsin Energy Corporation and more recently the Milwaukee region of Wisconsin. We have just over 5,700 members and \$100 million in assets. Empower 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.

While we are currently a well-capitalized credit union and would remain well-capitalized under the proposed rules, we would lose approximately \$1 million of excess capital in the calculation.

We are concerned with the discretion to increase a credit union's individual requirement during an examination or assessment, based on the examiners' subjective determination.

We are also concerned with the risk weightings on MBLs, mortgage loans, and investments, while excluding looking at loan-to-value or adjustable/fixed rate terms.

We would like to see more parity with the BASEL rules. We would also like to see a longer implementation timeline, similar to the implementation that the banking industry had.

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

Sincerely,

Jennifer Schilling
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