

From: [Julirey Velasquez](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Friday, May 09, 2014 1:11:35 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Houston Texas Fire Fighters Federal Credit Union (HTFFFCU), which serves Houston firefighters and their families. We have 16,000 Members and \$235 million in assets. HTFFFCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

The new Risk-Based Capital rule would not have an immediate impact on HTFFFCU but we are concerned about the effect it may have on the credit union industry. We question the need for a new rule based upon how well credit union's have performed during the recent recession.

Credit union's are currently overcome with new and un-necessary rules and regulations so adding another rule does not make sense. Your own estimation of the time necessary to comply is not reasonable. We do not need more burdensome regulation, we need less.

If you decide you must implement changes to RBC then please consider removing the ability to unilaterally impose higher standards, extend the implementation to at least 2019 and adjust the risk factors to a more appropriate level.

In summary, the proposal is not necessary and is burdensome. If passed there are significant changes that need to be made.

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

Sincerely,

Julirey Velasquez
5222 Santrey Dr
Houston, TX 77084