

From: [Larry Knopp](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Thursday, May 08, 2014 3:00:51 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of UniWyo Federal Credit Union, which serves University of Wyoming faculty, staff, and students as well as many other select employer groups in Laramie, Wyoming. We have over 19,000 Members and about \$250 million in assets. UniWyo appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

We have many concerns with the proposal. By over reaching with this proposal the NCUA risks more credit unions making the decision to convert to mutual savings banks. If the NCUA continues to ignore the unique structure of credit unions, credit unions may as well become banks.

The rule as proposed will put credit unions at a competitive disadvantage at a time when competition is intense. There has been no demonstration that such a rule is needed or that it will accomplish its alleged purpose.

If credit unions, due to this rule, change the way they invest excess funds and change the way we do mortgage lending for our members, everyone loses. The credit unions are at a competitive disadvantage and the members fail to get the products and services they want and need.

Please avoid further great wailing and gnashing of teeth as well as the potential for litigation by re-thinking this proposal. Thank you for your consideration.

Sincerely,

Larry Knopp, President
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Laramie, WY 82070