From:	Mark Bohdanyk
To:	_Regulatory Comments
Subject:	Risk-Based Capital Comment
Date:	Friday, May 09, 2014 3:58:35 PM

To: Regulatory Comments
From: Mark Bohdanyk
CU*Answers

05/09/2014

Dear Mr. Poliquin:

I started in the credit union space and moved over to a phenomenal CUSO that goes out of its way to truly serve not just the credit unions, but the members as well. After reviewing the proposed regulations, it seems that credit unions would be held to a standard egregiously more stringent than that of banks -- even the FFIEC and FIDC do not hold banks to this kind of standard. These proposed regulations undermine the cooperative principles of both credit unions and CUSOs -- the very principles that are a credit union's differentiation.

Our CUSO has historically (and is published) lowered pricing for our credit unions consistently for the last fifteen years! The proposal will discourage credit unions from investing in CUSOs like the one I work for -- which have provided credit unions with extensive benefits including, but not limited to, patronage dividends returns, reduced expenses and the ability to enter new markets with products and services they may have not been able to afford on their own, but in a cooperative context could be made available to them.

This harsh, blanket approach to regulating credit union CUSO investments -- and it's unworthy risk rating on the proposed tables -- makes no sense. I strongly encourage NCUA to reconsider the Risk-Based Capital proposal, especially as it relates to CUSO investments, take the proposal off the table until such a time as a capital requirement regulation that meets the needs of the industry can be designed. NCUA needs to engage with credit unions utilizing the cooperative spirit that credit unions were founded with and work with trade organizations and credit union leaders to create proposals that benefit the member and not the insurance fund.

Mark Bohdanyk
CU*Answers