From:	Danny Bostic
To:	_Regulatory Comments
Subject:	Proposed Regulation Comments - Prompt Corrective Action; Risk-Based Capital
Date:	Saturday, May 10, 2014 12:20:56 AM

This proposed rule change is misguided on several levels. The **Why is the NCUA Board issuing this rule?** section is the NCUA's opportunity to justify the change. Instead, the section describes the Board's conjecture and offers no data or evidence to support the proposed change. The **Summary** section and other areas throughout identifies NCUA's goal as making regulations more consistent with other federal banking regulatory agencies. It also states as a reason for the change "to address unique supervisory concerns raised by the NCUA." Credit unions operate under different business models than banks and should be regulated differently. Also, there is no justification to support the NCUA's concerns. Comparing credit unions to and treating credit unions like banks is a recurring theme throughout the proposal. Section **104(c)(2) Risk-Weights for On-Balance Sheet Assets** quantifies the false analogy by citing bank failure data between 2008 and 2011 as a reason for the increased credit union capital requirements. Section **102(a)(1) Well Capitalized** tilts the inappropriate comparison further by suggesting that credit unions have even higher capitalization requirements than banks. The next to last sentence in the second paragraph of the **Why is the NCUA Board issuing this rule?** section carries a tone inconsistent with much of the document. It's as if one of the final editors added it with defensive intentions in mind. At best, the proposed change is a non sequitur. At worst, it is retaliatory.

Thank you for reviewing my comments.

Danny E. Bostic