

**From:** [Matthew Akers](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk-Based Capital Comment  
**Date:** Monday, May 12, 2014 3:12:24 PM

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To: Regulatory Comments  
From: Matthew Akers  
CU\*Northwest

05/12/2014

Dear Mr. Poliquin:

I am both an employee of a CUSO and a member of a credit union. I understand that there is a need for financial responsibility. However, we need to understand that placing heavy regulation on an institution can stifle an industry to its core. We must work together to understand the needs of investment and risk management. The proposed regulation seriously defeats the cooperative principles we were founded upon; the same core principles upon which the entire credit union industry was formed. The regulation could have a major impact on the employees and the communities our credit unions serve as it will force their leaders to manage their credit unions solely for the creation of additional capital and not for the benefit of their members. In turn, we could lose many credit unions and have a serious financial impact to local communities that they serve. My recommendation is that the NCUA take this proposal off the table until such a time as a capital requirement regulation that meets the needs of the industry can be designed—and not one that's solely concerned with the health of your insurance fund.



Matthew Akers  
CU\*Northwest