

From: [Windy Campbell](#)
To: [Regulatory Comments](#)
Cc: [Suzanne Yashewski](#)
Subject: Windy Campbell comments on Proposed Rule regarding Risk-Based Capital
Date: Monday, May 12, 2014 2:00:43 PM

Dear Mr. Poliquin:

I am writing to oppose the proposed rule regarding Risk-Based Capital as drafted. The more I read the proposed ruling I find a lot of missing information. I am not able to find the steps or reasons showing how NCUA is to determine higher capital amounts. We have great concern that an examiner could do so on a subjective basis. Additionally, I have not seen any justification for why this rule is needed. As I am sure you are aware, former Senator D'Amato (a key player in the development of PCA in the Federal Credit Union Act) recently commented that such action by NCUA is contrary to congressional intent and beyond NCUA's legal authority.

What I have read are some numbers and facts from CUNA showing that this will effect over 2,237 credit unions who are already over \$50 million in assets. Many of them are over the 10.5% "currently proposed" risk-based ratio, but that 189 credit unions would experience a decline in their PCA classification, and at least 10 would become undercapitalized, just by the approval of this rule. Because of the subjective nature of the rule and the ability for NCUA to change the 10.5%, it could affect many other credit unions.

This is a hard economy to work through, members are being effected daily, and we as credit unions are doing our best to continue to provide them services so they can live. The more of these "unjustified" rules that we have to spend time and money trying to comply with, is time and money we don't get to spend on our original purpose, people helping people.

Sincerely,

Windy Campbell, CUDE

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