

**From:** [Thomas Jack](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Monday, May 12, 2014 3:00:53 PM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of Grove City Area Federal Credit Union which serves Grove City, Mercer, Slippery Rock and all the surrounding townships. We have 8,124 Members and 77 Million in assets. The Grove City Area Federal Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

Our Net Worth is well above NCUA guidelines and the in the RBC is implemented, we would still be well Capitalized. Do you really think we need this? The Credit Unions have been running successfully for about 80 years using the old guidelines. Why change? We can see no reason for this except that it will force some Credit Unions to merge with others to become larger. Even if they are financially stable Credit Unions. This will make less Credit Unions and we will be more like a Community Bank. We will be forced to generate more income to fall into your guidelines. If this comes to fruition, you should not pick and choose who and what you will impose on them. This will confuse the issue even more. You must be decisive and concise with your decision.

Do you agree with the risk weightings for:

- MBLs
- Mortgage Loans
- Longer-term investments
- Consumer loans
- CUSOs Investments and Loans
- Others (Please identify)

Should the NCSUIF deposit be excluded from the calculation of RBC ratios?

Should goodwill be excluded from the calculation of the RBC numerator?

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide?

Do you agree with NCUA's implementation time line? If not, how much more time should credit unions be provided?

Do you have other concerns with the proposal? Please explain.

Summary of your position:

[Write the summary of your position here.]

Thank you for the opportunity to comment on this proposed rule and for considering our views on risk based capital requirements.

Sincerely,

William T. Jack  
1600 S Center Street Ext  
Grove City, PA 16127