

From: [Ashley White](#)
To: [Regulatory Comments](#)
Subject: Ashley White - Comments on Proposed Rule: PCA – Risk-Based Capital
Date: Tuesday, May 13, 2014 10:41:47 AM
Attachments: [image002.png](#)
[image003.png](#)

As an employee of Resource One, I would like to take the time to address my personal concerns regarding the proposed Risk-Based Capital Rule. While I support the requirements for credit unions to be financially healthy, the proposal would instead have an adverse effect on the movement. I would like to express my concerns and offer the following comments with the intent to improve the proposal:

Thank you for allowing me the time to voice my opinion regarding the anticipated Risk-Based Capital Rule. As a devout advocate of the credit union movement I would like to comment on the potential upcoming Risk-Based Capital Rule. I hope my comments will aid potential improvements on the proposal:

As an employee of the Resource One, this letter represents my views regarding the NCUA's proposal on PCA – Risk-Based Capital. Although it is commendable in theory, it would leave detrimental outcomes. I fully support the concept for risk-based capital for credit unions, but would like to voice my concern and offer the following comments with the intention on improvement:

Although Resource One is well capitalized under both measures, our margin under the proposed risk based formula is reduced. I fully support the concept for risk-based capital for credit unions, but would like to voice my concern of the proposed draft and offer the following comments with the intent to improve the Proposal:

While I support requirements for credit unions to be strong financially, I believe this proposal could have a detrimental impact to the ability to grow. The NCUA needs to reconsider the proposed Risk-Based Capital Rule and I would like to comment conceivable alternatives:

I fully support the concept for risk-based capital for credit unions, but would like to express my concern and offer the following comments with the anticipation of improvements on the proposal:

The Risk-Based Capital is admirable in concept, however I anticipate some flaws and discrepancies as it is proposed. I would like to express my concerns and offer the following comments with the intent to improve the proposal:

Although NCUA's Risk-Based Capital could prove to be beneficial, the proposed rule

will have a negative impact on the credit union movement if implemented in its current form. I would like to make suggestions and comment to potentially improve its current limitations:

- The current system works, credit unions came through the last Recession, the worst financial crisis since the Great Depression, just fine. Resource One has long demonstrated consistent growth since it was originally chartered. Although I believe the NCUA is making motions to improve capital risk within the credit union movement, there seems to be flaws in its current state.
- Credit Unions have survived various economic downturns, such as the last Recession. Why is more capital needed, if with the Recession, we proved that the movement had adequate capital? The excess capital will come at the expense of our members.
- While credit unions fared well during the recession, banks stopped lending. The NCUA should not impose more stringent RBC requirements than banks. Credit unions will continue to endure and reap the benefits that banks cannot.

I conclude that although the proposal is admirable in theory, but modifications need to be made. I ask that the proposed rule be reexamined and be refined to allow all credit unions to continue serving their members' needs.

Thanks!



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