

From: [Lora Benrud](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital
Date: Tuesday, May 13, 2014 12:50:07 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of WESTconsin Credit Union which serves over 74,000 members in western Wisconsin and eastern Minnesota. Our assets are nearly \$900 million. I appreciate the opportunity to provide comments to the National Credit Union Administration (NCUA) on your proposed rule, Prompt Corrective Action - Risk-Based Capital.

Under the current capital requirements, we are well capitalized with a ratio of 10.71%. Under the new proposal, we remain well capitalized at 12.69% but with a much smaller cushion.

I understand that capital reform may be needed, but your new proposal may limit our ability to lend to our members and help our communities the way we do now. In addition, I do not agree that the NCUA would be able to impose higher capital requirements on credit unions on a case by case basis.

Please reconsider the risk weightings for MBLs, mortgage loans, longer-term investments, and CUSOs. The proposed risk weightings will severely impact how we serve our members and what we will offer them. I feel we are able to offer these products at very competitive terms which in turn helps our members and the local economy.

I am currently the Chief Financial Officer at WESTconsin Credit Union, where I have been employed for 30 years. I have seen what our credit union does for our members and our communities and your proposed rule would force us to make major changes in our successful business plan. Our members and communities would suffer if we would be forced to limit some of the things we are now doing.

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

Sincerely,

Lora Benrud
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