

From: [Sherryl Dieckman](#)
To: [Regulatory Comments](#)
Cc: [Cleo Segovia](#)
Subject: Sherryl Dieckman- Comments on Proposed Rule: PCA-Risk Based Capital
Date: Tuesday, May 13, 2014 5:59:49 PM
Attachments: [image002.png](#)
[image003.png](#)

Mr. Poliquin:

As a long time employee of Resource One Credit Union, I am taking my time in expressing my concerns with the proposed Risk-Based Capital Rule.

- I do not feel that you are justified in the need for this new proposed rule:
 - The Credit unions came through 2007-08, without needing one penny of the taxpayers' dollar. Why is more capital needed, if during the recent downturn, we proved adequate capital? The new requirement of excess capital will be at our member's expense.. the taxpayers and the constituents of many politicians. Credit unions came through the downturn of the recession and continued lending, banks did not. NCUA should not impose more harsher Risk Based Capital requirement than banks.
 - 18 month to comply is too short a period, this will not allow credit union enough time to restructure their balance sheet or time to effectively strategize and plan for the proposal.
 - MBL's assigning more risk in excess of 15% of assets has no basis considering credit unions are capped at 12.50%, unless the proposed regulation implies that waiver process serves no benefit to address the additional perceived risk.

Please carefully review the proposed rule. Thank you for the opportunity to voice my concerns on this matter.



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