

**From:** [Suzanne Peterson](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [Cleo Segovia](#)  
**Subject:** Suzanne Peterson - Comments on Proposed Rule: PCA - Risk-Based Capital  
**Date:** Tuesday, May 13, 2014 6:48:09 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Dear Mr. Poliquin:

As an employee of Resource One and a devout advocate of the credit union movement, 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 hope that they will aid potential improvements to the proposal:

- 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.
- Regarding member business loans, assigning more risk for member business lending in excess of 15% of assets has no basis considering credit unions are capped at 12.50%. Unless the proposed regulation implies the waiver process this serves no benefit to address the additional perceived risks in the eyes of the NCUA.
- The RBC proposal has a weight-risk of 150% for delinquent loans, while banks are only at 100% risk-rate. This excessive discrepancy between credit unions and banks is simply unfair. Keep in mind that banks report delinquency after 90 days while credit unions do it after 60 days.
- Instituting an 18-month timeframe to these changes is not enough time to allow credit unions to restructure their balance sheets effectively to increase the required capital. Credit unions need to be allowed more time to effectively strategize and plan for the proposal.

I appreciate your willingness to allow me to express my comments on this impactful regulatory proposal. I respectfully encourage you to consider improvements to the proposed Risk-Based Capital Rule in accordance with my views included in this letter. Thank you again for the opportunity to voice my opinions and comments on the proposal.

Sincerely,

**Suzanne Peterson**



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