

**From:** [Steve Shaw](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk-Based Capital Comment  
**Date:** Tuesday, May 13, 2014 9:41:00 AM

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To: Regulatory Comments  
From: Steve Shaw  
CU\*South

05/13/2014

Dear Mr. Poliquin:

I am an employee of a cooperative CUSO serving over 27 credit unions nationwide. A new rule that NCUA is proposing relative to risk-based capital was brought to my attention recently and has me genuinely concerned for my CUSO, our owners, and the members they serve.

The proposed risk-based weighting would limit our clients' ability to invest in our CUSO and the subsequent sharing of its annual profits. A harsh, blanket approach to regulating credit union CUSO investments simply does not make sense, and I strongly encourage the NCUA to reconsider the Risk-Based Capital proposal, especially as it relates to CUSO investments.



Steve Shaw  
CU\*South