

From: [Jorge Colunga](#)
To: [Regulatory Comments](#)
Cc: [Cleo Segovia](#)
Subject: Jorge Colunga-Comments on Proposed Rule: PCA – Risk-Based Capital
Date: Wednesday, May 14, 2014 10:21:54 AM
Attachments: [image002.png](#)
[image003.png](#)

Dear Mr. Gerald Poliquin,

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:

- 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

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.

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 respectfully and respectively ask the NCUA to carefully review the proposed rule, to either eradicate or alter certain guidelines for the development of all credit unions.

At your service,





Jorge Colunga

Branch Lead | R1 Tower

Member/Owner since 2007

p: 214-319-5559 | f: 214-292-0716

www.r1cu.org |  



CONFIDENTIALITY NOTICE The information in this e-mail may be confidential and/or privileged. This e-mail is intended to be reviewed by only the individual or organization named above. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein is prohibited. If you have received this e-mail in error, please immediately notify the sender by return e-mail and delete this e-mail from your system.

This e-mail and any attachments may contain confidential information. If you are not the intended recipient, please notify the sender immediately by return e-mail, delete this e-mail and destroy any copies. Any dissemination or use of this information by a person other than the intended recipient is unauthorized and may be illegal. Resource One Credit Union reserves the right to monitor all e-mail communications through its networks for quality control purposes.