

From: [Karen Pettus](#)
To: [Regulatory Comments](#)
Subject: Karen Pettus - Comments on Proposed Rule: PCA - Risk-Based Capital
Date: Wednesday, May 14, 2014 3:44:43 PM
Attachments: [image002.png](#)
[image003.png](#)

As an employee of Resource One, I would like to take the time to give 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 state my concerns and offer the following comments with the intent to improve 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.
- Performing collateralized consumer loans should have a lower risk weight than unsecured consumer loans. Resource One's historical delinquency rate for differs between secured and unsecured loans, which are 1.23% and 3.12% respectively.
- Although the proposal has good intentions for the movement, the one-size-fits-all approach applies to categories of assets, is a major weakness. We are all unique and there should be a better consistency with 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.



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