

From: [Lee MacMinn](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 14, 2014 10:30:08 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Freedom Credit Union, which serves the Philadelphia Region of Pennsylvania. We have over 62,000 Members and \$650 million in assets. Freedom appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

Freedom Credit Union feels that the standards are far too restrictive and punitive. It forces the credit union to manage to the ratios, and not our Members, who are the owners of this financial institution.

Our goal is to meet our Members' needs by expanding our mortgage and home equity portfolio, and we feel that the risk ratings associated with these goals are excessive and will stagnate the growth of the credit union.

Freedom also has a strategic plan that revolves around innovation and technology and if forced to reserve more capital, our ability to provide our Members with new products and services is also greatly lessened

Thank you for the opportunity to comment on this proposed rule and for considering our views on risk based capital requirements.

Sincerely,

Lee T. MacMinn
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