

From: [Patricia Rodriguez](#)
To: [Regulatory Comments](#)
Cc: [Cleo Segovia](#)
Subject: Patricia Rodriguez-Comments on Proposed Rule: PCA-Rick Based Capital
Date: Wednesday, May 14, 2014 10:26:21 AM
Attachments: [image002.png](#)
[image003.png](#)

Dear Mr. Poliquin:

As an employee of the Resource One, this email 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 came through the last Recession in 2007-08, the largest recession since the Great Depression just fine, without the needing one penny of taxpayers' dollars.
- Under the proposed timeline, credit unions looking to alter their investment portfolio due to the RBC method may be forced to sell investments at less advantageous terms. Based on the potential economic upswing, being penalized for investing in long term profitable investments seems to be onerous with the new proposal.
- Under the proposed Risk-Based Capital Rule, credit unions are being penalized for having unfunded commitments on non-business loans and business loans. In order to improve the RBC calculation, a credit union would look to either terminate or decrease those lines of credit to consumers or small business owners. Members need to be able to access those funds when they feel the necessity.

In summary, we believe the proposal as written has technical flaws as discussed, which could limit much needed credit to members. Thank you for your time and for allowing me to comment on the RBC proposal.

Regards,



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