



May 13, 2014

Mr. Gerald Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428

RE: Resource One Comments on Proposed Rule: PCA-Risk-Based Capital

Dear Mr. Poliquin:

As an employee of Resource One, I would like to take the time to express my 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 credit union movement. I would like to express my concerns and offer the following comments with the intent to improve the proposal:

- The current system works, credit unions came through the last Recession, the worst financial crisis since the Great Depression, just fine. Resource One has long demonstrated consistent growth since it was originally chartered. Although I believe the NCUA is making motions to improve capital risk within the credit union movement, there seems to be flaws in its current state.
- 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.
- 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.

I appreciate the opportunity to voice my concerns regarding the proposed Risk-Based Capital Rule. I sincerely hope you take my comments and views into considerations for possible improvements on the proposal.

Sincerely,

A handwritten signature in cursive script that reads 'Shireda McCoy'.

Shireda McCoy  
Branch Manager