

From: [Colleen Woggon](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Thursday, May 15, 2014 10:30:52 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Oakdale Credit Union which serves 9 Wisconsin counties. We have 10,092 Members and 59 million in assets. Oakdale Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

This proposal would likely put our Credit Union under the required capital threshold. In this difficult time to retain earnings and continue to be the great credit union we are to our members this new requirement is of huge concern. I feel the decision to impose higher capital on a case by case basis is not in the best interest of Credit Unions. We understand our credit union better than anyone and manage appropriately to be the kind of Credit Union consumers want. Let this drive our member owned business!

As far as calculations, I have a hard time understanding why in such a tight margin environment that investments carry such a high risk rating if, at all. The NCSUIF deposit should also be excluded from the calculation of RBC ratios.

In summary, we are opposed to this new rule and are hoping it can be revised to look at the bigger picture. Our member's capital is theirs and that should mean something. Giving back to the member in the form of low fees, better rates and excellent service is still our mission!

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

Sincerely,

Colleen Woggon
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