

From: [John Faust](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Thursday, May 15, 2014 12:50:52 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Diamond Credit Union which serves Berks County and parts of Montgomery and Chester counties in Southeastern Pennsylvania. We have 48,000 Members and \$431M in assets. Diamond 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.

Should the proposed Risk-Based Capital rule be implemented, Diamond would need need to increase its capital by approximately \$6 million in order to simply maintain the same cushion above above the proposed Well Capitalized Risk based capital ratio.

Given our current extraordinary financial strength coupled with how well we along with the vast majority of credit unions have performend and withstood the worst financial crisis in 80 years, there doesn't seem to be a creditable case for increasing credit union capital requirements.

Respectfully, we request that the proposed Risk-Based Capital rule does not move forward and that the current Capital standards and regulations be maintained.

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

Sincerely,

John M. Faust
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Pottstown, PA 19464