

From: [Terisa Chaney](#)
To: [Regulatory Comments](#)
Cc: [Cleo Segovia](#)
Subject: Terisa Chaney - Comments on Proposed Rule: PCA - Risk-Based Capital
Date: Thursday, May 15, 2014 5:11:17 PM
Attachments: [image002.png](#)
[image003.png](#)

Dear Mr. Poliquin:

Thank you for allowing me the time to voice my opinion regarding the anticipated Risk-Based Capital Rule. As a devout advocate of the credit union movement I would like to comment on the potential upcoming Risk-Based Capital Rule. I hope my comments will aid potential improvements on the proposal:

- The National Credit Union Administration has not demonstrated problems related to current prompt corrective action (PCA) regulation, other than a few isolated incidents. Credit unions have long positioned themselves to be able to withstand economic hardships. The RBC proposal is hurting instead of helping the financial health of credit unions.
- It is difficult to understand why all MBLs would have the same risk rating. A share-secured MBL holds far less risk compared to an unsecured line of credit. The RBC proposal will discourage credit unions from making these kinds of loans, which is a disservice to our members.
- “The examiner discretion” to change an asset’s risk rating is a major flaw by NCUA. It is crucial for credit unions to know objectively what their regulatory capital expectations are to better manage specific goals. The capital rule should be standardized for all credit unions. If the regulation is properly developed there should be no reason to change a risk rating.

Thanking you again for allowing me the opportunity to convey my comments concerning the proposal.

Sincerely,



Terisa Chaney

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