

From: [Tony Tiede](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Thursday, May 15, 2014 10:30:53 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Winnebago Community Credit Union, an \$80 Million financial institution serving over 7,000 Wisconsin members in Winnebago, Outagamie and Fond du Lac counties. Thank you for the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

Although we have numerous concerns with the RBC proposal; two items are particularly troubling. Allowing the ability to impose higher capital requirements on a case-by-case basis will permit arbitrary decisions making compliance almost impossible to plan for given examiners authority to vary their opinion from one year to the next.

We are also concerned about a Risk Based Calculation that would increase capital requirements. We just exited the worst financial crisis in the last 80 years and Credit Unions clearly demonstrated they can withstand such a shock. Requiring \$7 Billion in additional capital will harm credit unions, not help them. Our only option to raise that capital is via retained earnings - funds that could be used to provide better services, grow our credit union and improve our ROI.

In short, we have legitimate concerns about this proposal negatively impacting our ability to run a sound, fiscally responsible, not-for-profit financial cooperative, something we have done for over 60-years.

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

Sincerely,

Tony Tiede - President
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