

**From:** [Veronica R. Elkins](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [Cleo Segovia](#)  
**Subject:** Veronica Elkins - Comments on Proposed Rule: PCA- Risk Based Capital  
**Date:** Thursday, May 15, 2014 1:13:23 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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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:

- 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.

Instituting an 18-month timeframe to these changes is not enough time to allow credit unions to restructure their balance sheets effectively to increase the required capital. Credit unions need to be allowed more time to effectively strategize and plan for the proposal.

An item in the proposal that is very troubling is the concept that an Examiner can arbitrarily increase the required capital that a credit union will need to maintain. This is particularly troubling considering that the proposal is already more stringent than the banks and allowing the Examiners to require additional capital could result in unrealistic and inconsistent capital guidelines with no ability to know how to measure that additional required capital.

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.

Regards,

**Veronica Elkins**

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