

**From:** [Bernard Vilker](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk-Based Capital Comment  
**Date:** Friday, May 16, 2014 9:47:17 AM

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From: Bernard Vilker  
Xtend

05/16/2014

Dear Mr. Poliquin:

The CUSO I work for—one of the best in the country—serves other CUSOs, credit unions, and their members from coast-to-coast. I was recently made aware of the proposed changes involving Risk-Based Capital, and from my understanding of the regulation it will have direct negative impact on my CUSO and the credit unions it serves.

The proposed regulation seriously defeats the cooperative principles we were founded upon; the same core principles upon which the entire credit union industry was formed. The regulation could have a major impact on the employees and the communities our credit unions serve as it will force their leaders to manage their credit unions solely for the creation of additional capital and not for the benefit of their members. I encourage the NCUA to reconsider the proposal in its entirety and consider regrouping in a cooperative spirit with credit union leaders and trade organizations to draft a proposal that is for the benefit of the member and founded on our cooperative principles.



Bernard Vilker  
Xtend