

**From:** [Donna Bullard](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Friday, May 16, 2014 12:50:52 PM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of Clarkston Brandon Community Credit which serves five Counties in Oakland County, Michigan. We have 8800 Members and \$61M in assets. CBCCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

While our Credit Union would not be effected immediately I see dire consequences in the future regarding the services that we would choose to offer our members and our businesses in our communities.

I can't see why you would impose such a drastic change that will affect so many of the credit unions that are conservatively run and remain strong in spite of the Great Recession. These are the very Credit Unions that are helping the middle classes and sustaining our small businesses in our local areas.

While I understand your attention to safety and soundness I think our current system has been sufficient to control your concerns. Your control of poorly managed and economically suffering Credit Unions won't change.

The risk weighting seems unfair and unnecessary. The weighting for our CUSO's are almost 250% and seems excessive to organizations that make it possible to do the fine services that we offer to our membership that might not be available to us otherwise.

Not only are you suggesting changes that are unnecessary and detrimental to our Credit Union system but your time frame in which you suggest implementing these changes seems unfair.

We would request that these suggested changes be totally reconsidered and any changes in the system be delayed. Don't further hamper the services that local community Credit Unions offer to the members in our areas. Thank you for the opportunity to comment on this proposed rule and for considering our views on risk based capital requirements.

Sincerely,

Donna B. Bullard  
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