



May 15, 2014

Mr. Gerald Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

RE: Resource One Comments on Proposed Rule: PCA – Risk-Based Capital

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:

- Requiring a 250% reserve for a CUSO Investment will leave non-CUSO providers of services to a credit union at a competitive advantage. These larger providers often are focused on profit maximization and not the betterment of the movement.
- We disagree with the proposed rule limiting the allowance for loan losses in the numerator calculation to no more than 125% of risk assets. The ceiling seems arbitrary at best, and given the likely accounting rule changes in estimating the allowance, credit unions will be unfairly penalized.
- MBLs are weighted too heavily, given the restriction on the percentage of member business loans compared to assets. This prevents the credit union from growing in this asset class.

I respectfully and respectfully ask the NCUA to carefully review the proposed rule, to either eradicate or alter certain guidelines for the development of all credit unions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Norma Martínez', is written over the typed name and title. The signature is fluid and cursive.

Norma Martínez
Consumer Underwriter