

From: [Will Scott](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Friday, May 16, 2014 11:40:06 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of CDC Federal Credit Union, which serves the CDC and local Atlanta, GA membership. We have over 17,500 Members and \$262 million in assets. CDC Federal Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

Our credit union would be directly impacted by these regulatory changes. It would create significant challenges to management, to our Board and subsequently to our membership.

This proposal seems unnecessary and unfairly punitive.

Also, the NCUA should not be able to impose higher capital requirements on credit unions on a case by case basis.

In addition, the proposed risk weightings are arbitrary for:

- MBLs
- Mortgage Loans
- Longer-term investments
- Consumer loans
- CUSOs Investments and Loans

In summary, CDC Federal Credit Union does not support the current proposed risk-based capital regulatory changes.

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

Will Scott
Vice President of Lending
CDC Federal Credit Union

Sincerely,

Will Scott
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