



Member owned. Not-for-profit.

May 09, 2014

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

MAY19'14 PM 2:04 BOARD

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 address my personal 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 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.
- Regarding member business loans, assigning more risk for member business lending in excess of 15% of assets has no basis considering credit unions are capped at 12.50%, unless the proposed regulation implies the waiver process serves no benefit to address the additional perceived risks in the eyes of the NCUA.
- “The examiner discretion” to change an asset’s risk rating is a major flaw by NCUA. It is crucial for credit unions to know objectively what their regulatory capital expectations are to better manage specific goals. The capital rule should be standardized for all credit unions. If the regulation is properly developed there should be no reason to change a risk rating.

I appreciate your willingness to allow me to express my comments on this impactful regulatory proposal. I respectfully encourage you to consider improvements to the proposed Risk-Based Capital Rule in accordance with my views included in this letter. Thank you again for the opportunity to voice my opinions and comments on the proposal.

Sincerely,

A handwritten signature in black ink that reads 'Brittani Sayman' with a long horizontal line extending to the right.

Brittani Sayman
Branch Team Lead