From: Kraig Casey
To: _Regulatory Comments
Subject: Risk-Based Capital Proposed Rule
Date: Monday, May 19, 2014 1:22:25 PM

Dear Sirs:

The regulatory burden on credit unions will cause credit unions to go out of business and cause an unfair disadvantage in competition (banks). I realize that the more capital, the less risk or work for NCUA to regulate. The weighted risk on investments in excess of one year is stricter than the bank's 0% to 20%. Why would money held at the Federal Reserve Bank use a 20% risk weight – banks use 0% risk weight. I also am against higher risk weights on real estate and MBL balances. Don't credit unions already have more capital requirements than banks in the first place. Just trying to stay in business as a Credit Union and not change my charter to a Bank.

Thanks,

Kraig Casey
Asst. Manager
Standard Register FCU
937-449-0220
1-800-543-2283 ext. 220
1-800-223-8731 fax