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May 14, 2014

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

MAY19'14 PM 2:00 BOARD

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

Dear Mr. Poliquin:

Thank you for allowing me the time to voice my opinion regarding the anticipated Risk-Based Capital Rule. As a devout advocate of the credit union movement I would like to comment on the potential upcoming Risk-Based Capital Rule. I hope my comments will aid potential improvements on 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.
- If the RBC proposal is implemented, NCUA would assume authority to subjectively impose higher capital requirements on individual credit unions. Examining possible reasons for higher capital standards in the proposal, there seems to be a discrepancy and inconsistency from credit union to credit union.
- Loans made to borrowers with superior credit histories are treated in the same manner as loans made to borrowers with poor credit histories. The proposal should expand when dealing with credit and collateral risks.

Thanking you again for allowing me the opportunity to convey my comments concerning the proposal.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael Moore', is written over a horizontal line.

Michael Moore
Remote Branch Manager