From:	Terry Summers
To:	_Regulatory Comments
Subject:	Prompt Corrective Action Risk-Based Capital Comment Letter
Date:	Monday, May 19, 2014 4:00:07 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Health Care Family Credit Union, which serves the health care industry. We have 6794 Members and $52,204.942 in assets. Health Care Family 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.

I do not believe the new Risk-Based Capital ratio is needed. We just came though one of the worst financial crisis in 80 years. The financial institutions still standing prove they are well capitalized and can make it though a crisis. We need more time to rebound. With all the new regulations and the NCUA Stabilization in the last few years small credit Unions like Health Care Family Credit Union are having to spend more money to survive. We just created a full time position for a Compliance Specialist in able to stay on top of compliance.

We need to be able to continue to make loans for our members. If the proposed new risk based capital goes into affect it will limit our ability to make the loans our members need to purchase a home. We help our members with a junior lien loan to help them afford their new home. If this new RPC goes in affect we will be limited on how many more junior lien loans we will be able to do. Because it will negatively affect our capital ratio. Our underwriting is strong, we have low delinquency. Our current delinquency ratio is 0.22%. But with the new RBC it will not matter the quality of the loans, they will all be weighted the same no matter the loan to value, credit score, debt to income ratio and other qualities.

I do not agree with the weightings in the proposal especially the mortgage, consumer and delinquent loans. We would still be considered well capitalized but it would be a matter of time before we would drop if we continued with our current business plan.

I do not think the NCUA should be able to impose a higher capital requirements on credit unions on a case by case basis. This is giving too much power to one individual.

The timeline the NCUA is allowing for implementation on the new RBC is way too short. As a credit union we do not have all the resources to increase capital except make more money and this takes time. We are a not for profit cooperative.

I am the President of Health Care Family Credit Union. I have been with HCFCU for almost 29 years. I have been the President for almost 2 of those years. Running a credit union is hard job, it is a lot harder then it appeared from the other side of the desk. In this position you do not just turn out the lights at the end of the day, go home and forget about work. You think about it 24/7, even dream about it. I understand the NCUA wanting to make sure we are financially secure as an industry but I do believe the Risk Based Capital will harm more credit unions then help.

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

Sincerely,

Terry L. Summers
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