

**From:** [Carol Hauck](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Tuesday, May 20, 2014 4:30:07 PM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of First U.S. Community Credit Union, which serves federal employees and a 12-county community in Northern California. We have over 19,000 Members and over \$260M in assets. First U.S. appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

We feel that there is no need for the proposed system and that proposal would punish too many credit unions with higher capital set-asides, while the current system weathered the worst economic catastrophe since the Great Depression. The additional capital required may not only result in lower levels of member service and satisfaction but will also put credit unions at a distinct competitive disadvantage relative to the nation's for-profit banks. We are especially concerned about the Agency's proposal to give examiners the power to impose arbitrarily high capital standards on individual credit unions.

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

Sincerely,

Carol Hauck, President/CEO  
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