

**From:** [Martha Pierce](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Martha Pierce - Comments on Proposed Rule: PCA - Risk-Based Capital  
**Date:** Tuesday, May 20, 2014 4:36:09 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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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 came through the last Recession in 2007-08, the largest recession since the Great Depression just fine, without the needing one penny of taxpayers' dollars.
- Under the proposed timeline, credit unions looking to alter their investment portfolio due to the RBC method may be forced to sell investments at less advantageous terms. Based on the potential economic upswing, being penalized for investing in long term profitable investments seems to be onerous with the new proposal.
- MBLs are weighted too heavily, given the restriction on the percentage of member business loans compared to assets. This prevents the credit union from growing in this asset class.

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



**Martha Pierce**

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