

From: [Rob North](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Tuesday, May 20, 2014 6:20:51 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of SEI-US Employees Federal Credit Union, which serves federal employees. We have 2500 Members and \$16,500,000 in assets. SEI-US EFCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

How would your credit union be affected by the proposal? There are huge long term implications. We could be forced to increase our capital significantly and lower our member service. Instead of focusing on our members and helping them out we would be forced to worry about ratios.

Do you agree this new proposal is necessary? Absolutely not.

Do you agree NCUA should be able to impose higher capital requirements on credit unions on a case by case basis? Yes

Do you agree with the risk weightings for:

- MBLs-Yes
- Mortgage Loans-No
- Longer-term investments-No
- Consumer loans-No
- CUSOs Investments and Loans-Yes
- Others (Please identify)

Should the NCSUIF deposit be excluded from the calculation of RBC ratios? Yes

Should goodwill be excluded from the calculation of the RBC numerator? Yes

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide? No

Do you agree with NCUA's implementation time line? If not, how much more time should credit unions be provided? No-at least a year.

Do you have other concerns with the proposal? Please explain.

Summary of your position:
CEO

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

Sincerely,

Rob North
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Pocatello, ID 83204