

From: [Sylvia Chase](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Tuesday, May 20, 2014 10:40:52 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Tri County Federal Credit Union, which serves educator and support staff. We have 884 Members and \$4,000,000.00 in assets. Tri County FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

At this time the proposal will not directly affect our credit union, but what affects one credit union ultimately will affect all of us.

I feel that the proposal is not necessary.

If certain credit union needs higher capital then it should be worked with on a one to one basis.

I feel NCUSIF should be considered in the capital figures, as this is money the credit union has paid. Should goodwill be excluded from the calculation of the RBC numerator?

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide?

Do you agree with NCUA's implementation time line? If not, how much more time should credit unions be provided?

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

Summary of your position:
[Write the summary of your position here.]

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

Sincerely,

Sylvia Chase
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