

From: [Mickie Shaw-Traxler](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 21, 2014 12:40:06 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Rogue River Community Credit Union, which serves the Townships of Alpine, Sparta, Solon, Tyrone, Casnovia and Algoma all in Kent County. We have 6875 Members and are \$ 36,200,000.00 in assets. Rogue River Community 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.

Rogue River CCU in the past several years has struggled and succeeded to improve the financial stability of our operation by hard work, cutting costs in all areas, improving delinquencies by improving lending approval criteria and aggressive collections procedures. We have improved Net Worth to the degree that it has lifted certain Regulatory restraints. All attributed to an extremely dedicated Board of Directors, Management Team and support staff.

The new proposal would to a great degree inhibit the continued progress for smaller credit unions without a doubt.

A case by case basis may be an option however experiencing 36 years as a CEO of this Credit Union I have experienced at times the lack of communication and examiners inability to understand the vision of Boards and Management. I must say also the progress with examiner relationships with Credit Union Officials and Management improvement has been amazing.

Do you agree with the risk weightings for:

- MBLs
- Mortgage Loans
- Longer-term investments
- Consumer loans
- CUSOs Investments and Loans
- Others (Please identify)

Should the NCSUIF deposit be excluded from the calculation of RBC ratios? NO!!!!

Should goodwill be excluded from the calculation of the RBC numerator? NO

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..I am not sure

Do you have other concerns with the proposal? Please explain. Not at this time

My concern is that it must be understood that each institution is a separate institution. We have our own unique fields of membership and serve them in our own unique way. To be 'pigeon holed' due to a blanket policy is not fair to the membership or the those of us who work so hard to keep our credit unions thriving.

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

Sincerely,

Connie M Shaw-Traxler, CEO
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