

From: [Diane Moilanen](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 21, 2014 10:40:57 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Settlers Federal Credit Union, which serves Ontonagon and Gogebic Counties of Michigan - both counties are low income target markets. We have 3,267 Members and \$17541,050 in assets. Settlers FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

Although we are under the \$50 million threshold, portions of this proposed rule will have a negative impact on our credit union. I do not think the Capital to Asset Ratio proposed is realistic for our members. It will turn the focus more on profit than service --which is what credit unions are about.

I do not believe this proposal is necessary.

I think the NCUA should be able to impose higher capital requirements on credit unions on a case by case basis--but should have to justify why the higher capital requirement is being imposed.

Please reconsider this proposal and all the areas it addresses. It's not just about Capital.

Thank you for the opportunity to comment on this proposed rule.

Sincerely,

Diane M Moilanen
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