

From: [Janet McDaniel](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 21, 2014 4:40:07 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Alexandria Municipal Employees CU, which serves largely Alexandria's city employees. We have 2700 Members and \$21million in assets. Alexandria Municipal Employees 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.

How would your credit union be affected by the proposal?

This would put an unnecessary burden on the credit union and hinder our financial relationships with our members due to significantly lower levels of service. This will also put credit unions as a whole at a distinct competitive disadvantage. Policy makers should be encouraging more of what credit unions do, not less and this proposal demands less.

Do you agree this new proposal is necessary?

No.

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

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? I think it should be withdrawn.

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

Summary of your position:
Manager/CEO

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

Sincerely,

Janet McDaniel
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