

**From:** [Jeffrey Rabanus](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Wednesday, May 21, 2014 10:40:59 AM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of Metro North Federal Credit Union, which serves the Waterford and Holly School Districts. We have 6200 Members and 37,000,000 in assets. Metro North Federal 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.

I believe this action would negatively effect my credit union. Based on asset size, I will be at 50 million with in a ten year period.

I do not agree that this new proposal is necessary. It gives the examiners to much leverage with credit unions and is not standard across the board. I do not agree that the NCUA can give higher limits on a case by case basis.

I do not agree with the risk weightings for:

- MBLs
- Mortgage Loans
- Longer-term investments
- Consumer loans
- CUSOs Investments and Loans

Good will should be excluded from the numerator in the calculations and the NCUA should not be able to restrict dividend payments as proposed.

My concerns are with the survival of the small credit union. Putting undue stress on them by raising the capital requirements is not the way to do it. We provide an excellent service to our communities and want to continue to be competitive now and in the future.

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

Respectfully

Jeffrey Rabanus  
CEO  
Metro North Federal Credit Union

Sincerely,

Jeffrey Rabanus  
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