

From: [Karen Griffo](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 21, 2014 12:50:07 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Roswell Community Federal Credit Union which serves 5 counties in Southeastern New Mexico. We have 2426 Members and \$25,623,697.87 in assets. Roswell Community 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.

While today our credit union is under 50 million, should we experience a merger or continue to grow, this would certainly have an impact on this credit union. This proposed rule would add a barrier to our growth in the future.

I do not think this regulation is necessary, it does not even come close to the system bankers use and would be much more restrictive. Where is the fairness in that?

The fact that this would give examiners the ability to determine a "special" risk for every credit union based on their subjective opinion is just another tool that can be used to snuff out small credit unions.

NCUA is in place to regulate, not to manage credit unions. This rule would be duplicative and destructive to our nation's credit unions. It would most certainly have a negative impact in our abilities to serve our members.

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

Sincerely,

Karen Griffo, CEO
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