

**From:** [Lisa Anderson](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Lisa Anderson-Comments on proposed Rule PCA-Risk Based Capital  
**Date:** Wednesday, May 21, 2014 10:04:59 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Dear Mr. Poliquin,

As an employee of Resource One, this letter represents my views regarding the NCUA's proposal on PCA-Risk-Based Capital. Although it is commendable in theory, it would leave detrimental outcomes. I fully support the concept for risk-based capital for credit unions, but would like to voice my concern and offer the following comments with the intention on improvement:

- Credit Unions have survived various economic downturns, such as the last Recession. Why is more capital needed, if with the Recession, we proved that the movement had adequate capital? The excess capital will come at the expense of our members.
- Under the proposed timeline, credit unions looking to alter their investment portfolio due to RBC method may be forced to sell investments at less advantageous terms. Based on the potential economic u[swing, being penalized for investing in long term profitable investments seems to be onerous with the new proposal.
- The increase in the MBL reserve percentages based on concentration of 150-200% when the banking industry is at 100% appears excessive. Credit Unions have personal guarantees on their business loans when this is an option for the banks. We inherently are more conservative and this will limit ability to be competitive.

I appreciate the opportunity to voice my concerns regarding the proposed Risk-Based Capital Rule. I sincerely hope you take my comments and views into consideration for possible improvements on the proposal.

Thanking you again for allowing me the opportunity to convey my comments concerning the proposal.

Sincerely,



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