

**From:** [Linda Meeler](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Wednesday, May 21, 2014 11:10:53 AM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of Jackson ACCO Credit Union which serves employees of Armstrong Jackson, MS plant and employees of Shippers Express and their families. We have 425 Members and \$2.6 million in assets. We appreciate 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?  
negatively

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 with the risk weightings for:

- MBLs
- Mortgage Loans
- Longer-term investments
- Consumer loans
- CUSOs Investments and Loans
- Others (Please identify)

No.

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide?  
NO.

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

Summary of your position:

Examiners should not have powers to create requirements for credit unions for any reason. They should only examine to ensure policies and regulations in place are being properly enforced.

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

Sincerely,

Linda Meeler, CEO/Manager  
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Brandon, MS 39047