

From: [Matthew Perry](#)
To: [Regulatory Comments](#)
Cc: [Cleo Segovia](#)
Subject: Matthew Perry – Comments on Proposed Rule: PCA – Risk-Based Capital
Date: Wednesday, May 21, 2014 10:35:48 AM
Attachments: [image002.png](#)
[image003.png](#)

Dear Mr. Poliquin:

As an employee of Resource One, I would like to take the time to address my personal concerns regarding the proposed Risk-Based Capital Rule. While I support the requirements for credit unions to be financially healthy, the proposal would instead have an adverse effect on the movement. I would like to express my concerns and offer the following comments with the intent to improve the proposal:

- 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.
- While credit unions fared well during the recession, banks stopped lending. The NCUA should not impose more stringent RBC requirements than banks. Credit unions will continue to endure and reap the benefits that banks cannot.
- Credit unions came through the last Recession in 2007-08, the largest recession since the Great Depression just fine, without the needing one penny of taxpayers' dollars.
- The National Credit Union Administration has not demonstrated problems related to current prompt corrective action (PCA) regulation, other than a few isolated incidents. Credit unions have long positioned themselves to be able to withstand economic hardships. The RBC proposal is hurting instead of helping the financial health of credit unions.

I respectfully and respectfully ask the NCUA to carefully review the proposed rule, to either eradicate or alter certain guidelines for the development of all credit unions.

In summary, we believe the proposal as written has technical flaws as discussed, which could limit much needed credit to members. Thank you for your time and for allowing me to comment on the RBC proposal.

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