

**From:** [Pamela McCarty](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Wednesday, May 21, 2014 12:00:07 PM

---

Dear Secretary of the Board Poliquin,

I am writing on behalf of MyCom Federal Credit Union, which serves Berkshire County, Ma. We have 2500 Members and \$16,477,712 in assets. MyCom appreciates 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?

Although we are a \$16 million dollar CU, we could be directly affected by this requirement. Berkshire County is unique in that there are only seven Credit Unions left out of more than 14 when I began in the industry almost 30 years ago. Six of the Credit Unions are very small. We rely heavily on Greylock FCU (1.2 Billion in assets) for local, no cost training for our employees and board members, such as BSA, Robbery, Financial Literacy etc. This rule would certainly affect the services Greylock offers and may very well affect what they are able to provide to the small cu's in Berkshire County.

Do you agree this new proposal is necessary?

I do not agree that this proposal is necessary. This would put even more stress on capital requirements than already exists. We are all struggling enough with the low interest rate environment.

Do you agree NCUA should be able to impose higher capital requirements on credit unions on a case by case basis?

I don't think another burden is justified. If we look at the banks required Capital, it is clear that we are under much stricter rules as it is.

Do you agree with the risk weightings for:

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

Should the NCSUIF deposit be excluded from the calculation of RBC ratios? No

Should goodwill be excluded from the calculation of the RBC numerator? No

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide?

No

Do you agree with NCUA's implementation time line? If not, how much more time should credit unions be provided?

No, I think this proposal should be withdrawn.

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

I wonder what the future would be for healthy small credit unions pushed over \$50 million only to find themselves having to comply with an unreasonable risk weighting system. This would certainly inhibit their growth and viability.

Summary of your position:

Member Credit Unions did not participate in the predatory lending or risky investments that led to the economic problems of the last 6 years.

I see this as a result, in part, of certain corporate credit unions involved in a concentration risk that was overlooked by NCUA.

All Credit Unions - big and small - have paid the price for that. Lets not add to their burden!

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

Sincerely,

Pamela McCarty  
100 Johnson Rd  
Dalton, MA 01226