

From: [Annlouise Peroutka](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Thursday, May 22, 2014 4:00:07 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of The Coca-Cola Company Family FCU (TCCCFFCU) which serves The Coca-Cola Company employees, families and companies that provide services to TCCC. We have over 14,000 Members and are approximately \$163M in assets. TCCCFFCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

We believe that our credit union along with many,many others, will be harmed if this proposal is passed. The risk weightings, especially for member business loan and mortgage concentrations as well as for CUSO investments, do not appear to be properly calibrated for credit unions. Using higher risk weights on long-term assets to deal with interest-rate risk is misleading without considering liability maturities.

We have a large mortgage portfolio of high value homes, as benefits the managerment of The Coca-Cola Company. If higher risk weightings were placed on these mortgages, we would become unable to serve a part of our membership, which counts on the credit union to provide mortgages to senior leadership who are relocating to the United States from positions abroad. This is a valuable service we offer to our sponsor company, and we would hate to not be able to provide it.

We hope you will consider taking more time on this proposal and ensure that it will not cause credit unions to be unable to serve their membership for fear of a diminished capital position.

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

Sincerely,

Annlouise Peroutka
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Peachtree City, GA 30269