

From: [Bonnie L. Gall](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk Based Capital
Date: Thursday, May 22, 2014 2:46:40 PM

Dear Mr. Poliquin.

I am writing on behalf of Wiremen's Credit Union. We are a closed credit union that services a local trade union in Northeast Ohio, we have approximately \$23 million in assets and our membership is over 4300. I appreciate this opportunity to provide comments to NCUA on its proposed Prompt Corrective Action – Risk Based Capital rule.

While, I understand that at this time the proposed rule will not affect credit unions of my assets size, however, due to the uncertainty of how this proposed rule will affect privately insured credit unions, I feel it necessary to address my concerns regarding the rule.

I am extremely concerned about the ability of NCUA to arbitrarily raise the capital requirements of credit unions on a case by case basis, this seems subjective and unfair. Whatever the considerations would go into that capital determination should be documented in the rule so that credit unions can plan for what will be expected of them. Basing capital requirements on examiners discretion provides for far too much uncertainty and confusion.

I would also like to express my concerns on the 18-month implementation period. This timeline needs to be extended to give credit unions ample time to comply. Many credit unions will need to restructure their current balance sheet to remain well capitalized. With the current regulatory requirements, credit unions are already overwhelmed and this would cause additional stress for credit unions. I would recommend that credit unions be given a minimum of three years in which to make the necessary changes.

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

Wiremen's Credit Union

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