

**From:** [Cindy Rein-Zima](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action Risk-Based Capital Comment Letter  
**Date:** Thursday, May 22, 2014 1:40:08 PM

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Dear Secretary of the Board Poliquin,

I am writing on behalf of Hamilton Horizons Federal Credit Union, which serves the community of Hamilton Township, New Jersey. We have 3,850 Members and \$26 million in assets. Hamilton Horizons appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

Although not currently affected by this proposal due to our asset size, I still feel our voice should be heard.

I do not think this new proposal is necessary as credit unions are already required to maintain higher capital than other financial institutions.

The risk weightings for Mortgage loans could affect credit unions ability to provide them to members. I don't believe anyone who has been in the financial industry during the past 6 years wants Wells Fargo, Chase and Citibank as the only mortgage providers for consumers. That is in no one's best interest.

The NCSUIF deposit should be included in the capital calculation in all cases. Credit unions have paid into the NCUSIF each year including years of special assessments which clearly now, were not needed.

In no circumstance should NCUA be able to restrict dividend payments as the proposal states. That is a credit union decision.

NCUA Examiners should not be able to subjectively determine risk ratings using their "judgment". As NJCUL and CUNA's Exam surveys indicate, individual examiners may not be properly trained to make those decisions and examiner personality conflicts with credit union management could affect their handling of the matter.

I am against this proposal and do not feel it is necessary.

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

Sincerely,

Cindy Rein-Zima  
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