

From: [Jennifer Tiedman](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Thursday, May 22, 2014 1:10:06 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of FIRST PACE Credit Union, which serves USW Union members and their families. We have 1260 Members and \$8 million in assets. FIRST PACE Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

We would not be directly affected by this proposal at this time, but several of our peer credit unions would be hurt trying to obtain additional questionable capital. If we were to grow above the \$50 million threshold, we would not want to be automatically considered a "complex" credit union.

This proposal needs more review as certain aspects need to be reconsidered such as the NCUSIF not being taken into consideration of the risk based capital calculations.

If NCUA were to restrict dividend payments, that would infringe on the democratic nature of credit unions' Board of Directors responsibilities of operating their credit union in a safe and sound manner.

Interest rate risk evaluation is part of the exam process and examiners should not be allowed to arbitrarily impose high capital standards on individual credit unions.

I believe NCUA needs to revisit this proposal and take into considerations credit unions comments in regard to how the proposal currently is written. Some credit unions may need to be reviewed on a case by case basis, but be mindful that most credit unions survived the economic crisis and were not a cause of it.

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

Sincerely,

Jennifer Tiedman, President
1067 Livingston Ave
Saint Paul, MN 55118