

From: [Mary Zillman](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Thursday, May 22, 2014 12:00:09 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Brokaw Credit Union, which serves six counties in central Wisconsin. We have 7000 members and are \$47 million in assets. Brokaw 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.

First I will state that our credit union would not be immediately affected by the proposal as we are just under \$50 million in assets; however we will one day surpass that mark, and we realize that investments and lending opportunities we may not currently be involved with today, may exist in the future, and the RBC rule will then affect us. Sadly, knowing the challenges this rule could create may incent us not to grow in areas beneficial to our members, not to mention the competitive disadvantage we would endure.

I am mystified as to why this rule needs to be imposed. We've offered many of these products for years, and have just weathered one of the most troubling times of our days. What is really driving this proposal?

Also, I emphatically oppose allowing the NCUA to impose higher capital requirements on a subjective, case-by-case basis. This is unfair, and is a gross overreaching of regulatory oversight.

In summary, I am STRONGLY opposed to the NCUA's Risk Based Capital Proposal as it would inhibit our growth, vitality, competitive ability, AND impose another burden on our credit union that does not have a substantiated purpose. Additionally, to grant subjective, arbitrary power to a government agency on a case-by-case basis is just wrong.

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

Sincerely,

Mary Zillman
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