

From: [Tracie Parker](#)
To: [Regulatory Comments](#)
Subject: NCUA Risk-Based Capital Proposed Reg
Date: Thursday, May 22, 2014 2:59:59 PM

To Whom it may concern,

First off the fact that you want to make us more like Banks is amazing in itself! But the following points are the reason we should stay as Credit Unions,

It is modeled after the banking industry's model who has had far more losses than the credit union industry (\$2.30/\$1,000 vs. \$0.26/ \$1,000 from 2007-2013)

Creates regulatory risk to the credit union

Applies the same risk ratings to consumer loans across the board regardless of collateral and underwriting

Investments in CUSO's are risk-weighted at 2.5 times the amount. CUSO's are formed to help credit unions compete against big banks and we should not be penalized for doing so

Thank You for your time,

Tracie Parker

Accountant

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A promotional banner for White Crown Federal Credit Union. On the left, there is a small illustration of a person riding a motorcycle on a road. To the right of the illustration, the text "SPRING HAS SPRUNG" is written in a large, bold, blue, sans-serif font, followed by "GET YOUR BIKE, BOAT OR RV LOAN" in a slightly smaller, bold, blue, sans-serif font. Below this text, a horizontal line separates it from the final line of text: "Close your loan between March 1 & May 31 and be entered to win a \$500 gift card." The entire banner is enclosed in a black border.

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