

From: [Craig Roy](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Friday, May 23, 2014 9:00:50 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Heart of Louisiana Federal Credit Union, which serves underserved residents of Central Louisiana. We have over 16,000 Members and \$95 million in assets. Heart of Louisiana Federal 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.

I am concerned that this proposal will cause us to be more likely to investment our liquidity rather than lend money to the people in our area who need it. Currently, we would still be considered well-capitalized but I feel that if we shift some of our balance sheet from investments to loans we will penalized because of the weighting system being used. This makes absolutely no sense to me at all.

I do agree that NCUA needs to take steps to insure that Credit Unions are property capitalized, but the methodology is seriously flawed and needs to be totally revamped.

The weights assigned to various loan categories make no sense whatsoever. Why are business loans weighted so heavily?

The NCUSIF deposit should not be excluded from the calculation. Again, this makes absolutely no sense to me.

The proposal is too far-reaching and gives too much power to individual examiners.

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

Sincerely,

Craig A Roy
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