



Ward County Teachers Credit Union

Our Members Are The Owners

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May 22, 2014

Mr. Gerard Poliquin, Board Secretary
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3425

regcomments@ncua.gov

Dear Mr. Poliquin;

I appreciate the opportunity to comment on NCUA's proposed Risk Based Capital (RBC) – PCA Regulation.

Ward County Teachers Credit Union is a - \$16 million dollar (asset) credit union, serving approximately 1,500 members, primarily from one county in rural west Texas.

I can agree with the idea behind Risk Based approach to Capital requirements if it could be handled with a consistent approach - not with examiner discretion! The proposal will keep many larger credit unions from offering business loans, mortgage loans, and other services – but it will keep smaller credit unions like mine from even thinking about expanding services or from taking on additional risk that will benefit our members.

Even as small as we are we offer a few very basic / simple business loans – self employed mom/pop type situations:

An independent welder needs a larger pick up type vehicle – technically, if he puts an employee in the vehicle and the loan exceeds \$50,000 then the loan is a business loan. While the same day another member buys that same Ford King Ranch pick up for personal use to pull his boat with and it is a simple consumer automobile loan. Same type loan, same risk.... But is regulated differently!

Regulatory Burden (Paperwork Reduction Act)

As drafted, the proposal increases the regulatory burdens of ALL credit unions, even those under \$50 million in assets. ALL credit unions will collect risk based capital data – your own estimates are 160 hours -- A MONTH worth of work hours! We have six employees – does NCUA really think it is reasonable that a small credit union (or anyone) should spend a month of the year on this proposed regulation or be serving our members?

Sincerely;

Kay Rankin - Swan

President
WCTCU