

From: [Amy Rohrbach](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Tuesday, May 27, 2014 2:50:06 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Discovery Federal Credit Union, which serves Berks County in Pennsylvania. We have over 9,000 Members and approximately \$130 million in assets. Discovery FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital. I have just a few concerns I would like to express.

Our credit union, although currently well-capitalized, would take quite a "haircut" to our net worth with the new proposal. Operating within the current heavily regulated environment is already a challenge with great capital.

I do not feel the new proposal is necessary nor is it rightly justified.

I do not agree with the risk weightings for certain categories especially MBLs. Although the NCUA looks at these loans to be extremely risky I believe it depends on the types of businesses and loans granted. If it would not have been for MBLs the past couple of years we would not be in the lending business.

I also believe the NCUA should not interfere and restrict dividend payments. Credit unions should be able to pay their members to the best of their ability without any restrictions.

I think the proposal needs some review, modifications and definitely more time for any phase-in.

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

Sincerely,

Amy Rohrbach
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