

From: [Jacquie Rutherford](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Tuesday, May 27, 2014 7:00:53 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Mt. Rainier Federal Credit Union, which serves the Puyallup Community in Washington State. We have 1237 Members and 11,400, in assets. Mt. Rainier 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.

Do you agree this new proposal is necessary? No

Do you agree NCUA should be able to impose higher capital requirements on credit unions on a case by case basis? No

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide? No

Summary of our position:

Many healthy small credit unions will some day be larger - growing above the \$50 million threshold that automatically makes them complex under the proposal. Inflation alone will cause a significant number to cross the threshold in the next few years. This will expose small credit unions to the proposal's unreasonable risk weighting system and defective interest rate risk scheme, while it will seriously inhibit their growth, vitality and viability.

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

Sincerely,

Jacquie Rutherford
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