

From: [Z. Suzanne Chism](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 28, 2014 2:40:52 PM

Dear Secretary of the Board Poliquin,

On behalf of, Texas Health Resources Credit Union, which serves Texas Health Resources, it's affiliates and a small community base I wish to address the Risk Based Capital proposal. We have 3825 Members and \$16,600.00 in assets. Texas Health Resources appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

While this size credit union would not be immediately impacted, it is concerning to see further requirements such as this be put into place.

If an institution maintains Well Capitalized status it should not be required to have additional capital unless the historical performance dictates there is a problem. There are many well run credit unions that should not have to deal additional burdens because a few might get into problems with their loan, investments, mortgages or MBL's. Those that have historical problems should be dealt with on an individual basis.

I do not share the necessity for this proposal and hope that this will be taken into consideration.

I strongly request that consideration be given to not excluding the NCUSIF.

Do you agree NCUA should be able to restrict dividend payments as the proposal would provide?

If implemented, the timeline is far to aggressive. Please consider what was done in Basel III.

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

Sincerely,

Z. Suzanne Chism
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