

From: [Bob Gerads](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 28, 2014 9:51:36 AM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Central Minnesota Credit Union, which serves more than 50,000 throughout an 18 county field of membership in rural MN. We have \$850 million in assets including nearly \$679 million in member business loans . CMCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

The RBC proposal as written would limit if not eliminate CMCU's ability to serve our member businesses. Without substantial changes the resultant impact on capital requirements will put Central Minnesota out of the commercial lending business. The result will mean fewer borrowing options, and frankly zero credit union options for a large number of small businesses throughout Central Minnesota.

As a member of the management team at Central Minnesota Credit Union I strongly urge the NCUA to reconsider the Risk Based Capital proposal as this proposal will have extensive detrimental unintended consequences to the 70 credit unions it impacts across the United States.

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

Sincerely,

Bob Gerads
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