

**From:** [Paulson, Carlton](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Prompt Corrective Action - Risk Based Capital Comment Letter  
**Date:** Wednesday, May 28, 2014 9:40:44 AM

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I've tried to understand the proposal, to see things from a regulatory standpoint. I can't help but revert to my stand as a credit union employee, relying on this employment to make my living.

Baylor Health Care System Credit Union is \$63m in assets. According to your proposal that makes us "risky". However, if I understand what your RBC calculator tells me, I don't have anything to "worry" about – we're "well capitalized". This doesn't help me to feel better about this regulation. I believe in the "ripple effect" (and I have no reason to believe that this proposal, as it stands, would NOT affect the entire industry). I also believe that what may not affect me today might, at the very least, be putting me in a precarious position tomorrow; that more regulation is coming that, frankly, will put many otherwise healthy cu's out of business – merely because they didn't meet a seemingly arbitrary new regulation.

I know you've received approximately 1,100 letters from us. I've read the letter from NAFCU. I'm going to keep this brief: of course, I support the efforts to get you to tap the breaks on this proposal.

Thank you.

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