

From: [Will](#)
To: [Regulatory Comments](#)
Subject: NCUA Risk-Based Capital Proposed Reg
Date: Wednesday, May 28, 2014 9:34:00 AM

I am a Credit Union Member and feel the proposed RBC rule should not be adopted as written.

My Credit Union has been doing business for over 76 years and continues to be sound and secure. They have been meeting the needs of the members just fine without the need for a RBC regulation. This rule will require more capital just to comply with the model and that will take money away from meeting the members' needs.

Section 702.105c states that the examiner's judgement and expertise come into play when determining appropriate minimum capital levels. That is the Board of Directors responsibility not NCUA's and they have gotten it right for over 76 years.

I believe that this rule is intrusive damaging to my Credit Union and Credit Unions in general.

The membership elects and trusts our Board of Directors not the regulators. This regulation would give the regulators power to override the Board and undermine the successful member owner cooperative model.

This regulation also does not include an appeal process.

NCUA will harm the Credit Union industry with this regulation.

Will Dahmen
Sent from my iPhone