

From: [Glenna Osborn](#)
To: [Regulatory Comments](#)
Subject: NCUA Risk-Based Capital Proposed Reg
Date: Wednesday, May 28, 2014 4:30:11 PM

Dear Mr. Gerard Poliquin,

Thank you for the opportunity to comment on NCUA's proposed risk-based capital rule.

Although my \$44 million credit union would not be directly affected by the ruling at this time, it gives me cause for concern in the not so distant future. The current capital model provided an appropriate safety net for credit unions during the most adverse economic conditions since the great depression. The simple leverage ratio is much more effective than RBC.

The scariest portion of the rule would allow examiners to subjectively pass judgment on an individual credit union leaving the system open to abuse and giving examiners the authority to second guess the credit union's management and board of directors.

Please allow credit unions to serve our members like member owned financial cooperatives instead of like a bank.

Sincerely,

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