

From: [Kim Lindemann](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 28, 2014 6:50:07 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Western Rockies Federal Credit Union, which serves Mesa, Garfield, Pitkin, and Eagle Counties in Colorado. We have 14,500 Members and \$104,000 in assets. Western Rockies Federal Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

We are concerned that higher capital requirements are unnecessary and will put excess pressure on credit unions still struggling to recover from the economic downturn. This may hurt the credit union movement as a whole and inhibit individual credit unions' ability to serve members competitively.

We believe that the National Credit Union Share Insurance Fund 1% deposit should be included in the risk based capital calculation.

More credit unions than NCUA has indicated may be impacted by this rule and we request that more time be taken to evaluate the necessity of this rule and its implementation deadline.

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

Sincerely,

Kimberly D. Lindemann
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