

From: [Tony Molina](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action Risk-Based Capital Comment Letter
Date: Wednesday, May 28, 2014 6:20:52 PM

Dear Secretary of the Board Poliquin,

I am writing on behalf of Community Alliance Credit Union, which serves Wayne, Monroe, Oakland, Washtenaw and Livingston Counties. We have 9,507 Members and \$94 Million in assets. Community Alliance 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.

I believe that this rule is not needed in its present form as the industry is very healthy and back on solid ground. The additional capital required for Risk Base Net Worth will decrease the equity position that credit unions have built up the past few years. Having to set aside additional funds in our equity will take away from giving our members the product and services they need.

I'm also concerned with the unintended consequences of giving our examiner in charge the ability to raise our minimum capital requirement without any due process.

I believe that by adopting the Risk-Based Capital requirement in its present form is not only bad for the credit union industry but also hurts our members in the long run.

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

Sincerely,

Tony Molina
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Dearborn, MI 48126