

Regulatory Comments

From: CHUCK HALLER <no-reply@cuanswers.com>
Sent: Friday, April 10, 2015 4:30 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: CHUCK HALLER
FRANKENMUTH CREDIT UNION

04/10/2015

Dear Mr. Poliquin:

The NCUA and the credit union industry would both be served better if the formulas and risk weights within RBC were not given the force of law. Do not force my credit union to institute changes both potentially drastic and unwarranted in our balance sheet to meet these arbitrary weights.

Our credit union believes the RBC2 rule would undermine the cooperative and diverse nature of our charters by creating a one size fits all over-reaching capital formula. This is a massive flaw of the NCUA's structure as regulator and insurer. We believe this is a myopic view of cooperatives and only considers our equity funding mechanism. A cooperative is a like group of individuals banding together to own a business that is guaranteed to meet their similar financial needs. The arguments and logic of the rule misapplies what is done successfully at a local or institutional level, to an entire system. Because of this I would respectfully recommend the rule be thrown out and at best become a matrix the NCUA would use in the exam process only.

I am a member of a credit union and I am opposed to the revised Risk-Based Capital regulation. The proposed rule's one-size-fits-all approach treats our credit unions as if they were banks, ignoring the fundamental differences in structure and ownership. Don't take the easy road to governance by copying the banking industry-treat my credit union like a credit union. Thank you,

I am an employee and member of a credit union and I am opposed to the revised Risk-Based Capital regulation. If your goal is to protect the NCUSIF, why implement a rule that will make it harder for credit unions to provide high quality services and rates to their owners? In the last ten years, fraud has caused 41% of failures. Turn your attentions to what matters, don't harm the vast majority of credit unions that have been operating the right way for years. Thank you,

A handwritten signature in black ink that reads "Charles Haller". The signature is written in a cursive, slightly slanted style.

CHUCK HALLER
FRANKENMUTH CREDIT UNION