

Regulatory Comments

From: Cindy Williams <no-reply@cuanswers.com>
Sent: Tuesday, April 14, 2015 3:44 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: Cindy Williams
Oak Trust Credit Union

04/14/2015

Dear Mr. Poliquin:

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,



Cindy Williams
Oak Trust Credit Union