

From: [Sally Dischler](#)
To: [Regulatory Comments](#)
Subject: S Dischler Comments on Proposed Rule: Risk-Based Capital
Date: Wednesday, April 15, 2015 2:05:10 PM
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Dear Mr. Poliquin;

I believe the revised RBC rule penalizes credit unions for specific activities such as real estate lending, member business lending. These two lending products compromise 65% of our lending portfolio. We have been involved in agricultural lending for 20 years and managed to program with minimal losses.

1. The trigger to be a well-capitalized credit union was lowered from 10.5% to 10.0%. Still too high.
2. The concentration penalty for business loans and mortgages is still too high.
3. For some consumer loans the risk weights actually increase.
4. CUSOs are still overly penalized. CUSOs will be critical for non-interest income, but CUSOs have an effective risk weight of essentially 1.50.
5. The mortgage servicing rights risk weight remains at 2.50.

Without question, the proposed RBC rule guts the competitiveness of credit union lending and investments, adds substantial, unnecessary financial costs to credit union members, and attempts to rewrite federal law as it applies to credit union net worth statutes.

Thank you for your consideration.

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