

From: [Donna Bullard](#)
To: [Regulatory Comments](#)
Subject: RBC
Date: Friday, April 17, 2015 5:33:43 PM

Dear Mr. Poliquin,

After reading and researching the potential impact of RBC on credit unions I think that Mr. Chris Howard from Callahan and Associates sums it up quite well. He said and I quote from his recent article, "When a regulator thinks it knows the future, it acts consistent with its beliefs. It creates an "ideal" profile and encourages all institutions to adopt it uniformly. This is what we see the NCUA doing today. The goal may be to reduce systemic risk by limiting exposure to negative events, but the reality is different. By punishing diversity and encouraging credit unions to become homogenous, this approach actually increases systemic risk, exposing every element of the system equally".

I think that as CEO's and Regulators alike we need to step back and stop the knee jerk reactions to unsuspected outcomes that occur that are out of our control or perceptive abilities to foresee. We need to be able to keep doing the job for which we are so well known-taking care of the needs of our members. We are not cookie cutter institutions with identical member needs. Each time these types of regulations continue to be born more and more of our members are hurt in the long run. We have survived the great recession and have continued to provide the services our members need and want. Doesn't that speak for itself? Are more restrictive regulations required? Would all of those institutions that failed during the recession have been saved by RBC? I think the answer is no. So in closing I want to again ask that the opinions of the credit unions who are doing their jobs in a fiscally responsible manner, serving their diverse member needs competently, be allowed to continue to do what we do without even more restrictive regulation. Remember, in the end it is the member who will suffer for more restrictions by this regulation.

Sincerely,

Donna B. Bullard, Pres/CEO
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