

Regulatory Comments

From: Dawn Lamb <no-reply@cuanswers.com>
Sent: Friday, April 17, 2015 12:59 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: Dawn Lamb
Bay Area Credit Union

04/17/2015

Dear Mr. Poliquin:

Our credit union board and management team are making numerous decisions about the composition of our balance sheet and capital adequacy based on the needs of our unique membership and local community. These factors do not just take into consideration the asset type, but include the reasons for our charter to begin with, corresponding funding from liabilities, and unique economic needs of the communities they serve. These thousands of local decisions are driven by diverse business priorities, pricing and growth objectives as well as responses to unique local needs. We believe our decisions have resulted in varied portfolio strategies which enhance the balance sheet's overall soundness rather than a single approach nationwide to risk management. RBC2 puts that at risk.



Dawn Lamb
Bay Area Credit Union