

## Regulatory Comments

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**From:** John rupert <no-reply@cuanswers.com>  
**Sent:** Monday, April 20, 2015 3:48 PM  
**To:** \_Regulatory Comments  
**Subject:** Risk-Based Capital Comment

To: Regulatory Comments  
From: John rupert  
Muskegon Co-op Federal Credit Union

04/20/2015

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.

A handwritten signature in black ink, appearing to read "John Rupert". The signature is stylized and somewhat cursive, with a large, prominent loop at the beginning and a long, sweeping tail.

John rupert  
Muskegon Co-op Federal Credit Union