

From: [Melissa Rosasco](#)
To: [Regulatory Comments](#)
Subject: Implementation of Risk-Based Capital
Date: Monday, April 20, 2015 7:53:17 PM

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Good evening!

I am a long time employee of Wright-Patt Credit Union, Inc., (WPCU) based in Beavercreek, Ohio and have been blessed to work for this wonderful organization for 20 years.

I am writing to ask that you consider not implementing the proposed rule on risk-based capital as I don't believe this is a good thing for our credit union or credit unions in general. WPCU has always been very strong and has always displayed a desire, and a skill, at making sound decisions for our members. If this new rule is implemented, I believe it will drastically change how our Board and Management make their decisions on how we can best serve our members. I also don't believe it will provide any new benefit over the capital rules that we currently operate under and have for many, many years.

I would be remiss if I also didn't mention how concerned I am that the NCUA rule is so similar to the capital rules that are currently used for For-Profit banks. Credit Unions are CLEARLY not For-Profit financial institutions and we should not be regulated the same. Over the years it has pained me greatly to see the negative impact that poor government regulations have had on credit unions. Regulations that are simply strangling credit unions to the point where they no longer can provide the financial services and opportunities to the every-day-average American as they were founded to do. If NCUA is going to do a good job of regulating and supervising credit unions, then they should do it with a clear understanding, and *appreciation*, of how credit unions are different than banks.

WPCU has done a great job of serving members for a very long time, since 1932, yet we are given more and more rules every year in which to comply. This one, the risk-based capital rule, just is not necessary and I am respectfully asking that you do not implement it.

Regards,

Melissa Rosasco
Wright-Patt Credit Union, Inc.

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