

From: [Jon Mallaber](#)
To: [Regulatory Comments](#)
Subject: Risk Based Capital Rule
Date: Wednesday, April 22, 2015 8:50:56 AM

Credit Unions and NCUA have been struggling over a very important new Risk-Based Capital (RBC) rule. RBC will impose tremendous additional regulatory, compliance, and capital requirements on all credit unions. RBC also provides broad discretionary power for the federal regulator to impose sanctions on credit unions with no provision for independent review or appeal. This is not good government and goes against our American democratic traditions. If the Risk Based Capital rule is truly important, then our Congress should approve the new law. That is how our democratic system works.

Jon Mallaber