_Regulatory Comments

From: Scott Rushforth <no-reply@cuanswers.com>
Sent: Wednesday, April 22, 2015 11:23 AM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: Scott Rushforth
Horizon Utah Federal Credit Union

04/22/2015

Dear Mr. Poliquin:

History has shown that the cooperative model of credit unions is a successful one. The diverse nature of our charters has meant that despite little capital—except member good will and loyalty—the forefathers and current stakeholders of the industry have built the second largest financial system in America today, serving close to 40 million households with savings of nearly $1 trillion. The proposed rule will serve to hinder that diversity by placing credit unions into more general categories. Protect the true nature of credit unions by ending this rule so we can celebrate the charters that made this industry possible, from the $60 billion Navy FCU to any of the $1-5 million “family” credit unions. From the farming communities of South Dakota serving family farms with loans to the taxi drivers from NYC to San Francisco. From the raw recruit in San Diego to the forward deployed military professional in Diego Garcia, Korea, or Afghanistan. From the auto worker in Detroit or Tennessee to the high tech communities of Silicon Valley.

Although Congress has stated NCUA must develop risk based capital standards and they must be formulated in a similar fashion as the banking industry, we do not believe Congress wished to create a tax on members and abandon the cooperative principles of credit unions. Since the publication in the Federal Register the actual costs associated with this capital tax have been challenged. Recently NAFCU published an estimate that credit unions will need to raise an additional $760 million dollars in capital to achieve their current capital levels. Because credit unions only have one source of earnings, that additional capital tax must come directly out of our members’ pockets through a reduction in savings rates, increase in loan rates, and potentially changes to transaction fees. We believe NCUA’s estimate falls far short of the actual cost to the industry and again focused on the potential risk to the insurance fund rather than those they regulate and ultimately their members . In an effort to remain the best financial resource for our members, we would encourage the NCUA to withdraw the proposed rule altogether.

I am a member of a credit union and I am opposed to the revised Risk-Based Capital regulation. The proposed rule's one-size-fits-all approach treats our credit unions as if they were banks, ignoring the fundamental differences in structure and ownership. Don't take the easy road to governance by copying the banking industry-treat my credit union like a credit union. Thank you,

I am an employee and member of a credit union and I am opposed to the revised Risk-Based Capital regulation. First, because although we are fundamentally different from banks, this regulation seeks to treat us the same. And second, because even the FDIC's Vice Chairman thinks a Risk-Based Capital approach is a bad idea! By implementing the rule, you won't serve our interests, our members', or the NCUSIF's; you'll only be creating a bigger mess for later. Please remove RBC from consideration. Thank you,

Scott Rushforth
Horizon Utah Federal Credit Union