From:	Nancy Montie
To:	_Regulatory Comments
Subject:	Comments on Proposed Rule - "Risk Base Capital" - RBC2 proposal
Date:	Thursday, April 23, 2015 6:16:10 PM

To whom it may concern,

I am responding to the 90 day comment period for proposal – (RBC2) (12 CFR 702).

(Risk Based Capital Proposal)

I "Thank You" for your time and changes to the original proposal but do not feel they go far enough or should this proposal be necessary at all.

Even though based on the #1 change - credit unions affected by asset size, would not include our credit union currently,
it eventually would. And even though this change would not affect as many C.U.'s as the original proposal….

I still oppose this proposal for the following reasons:

Credit unions are already, highly regulated and are reviewed in many ways for "Concentration Risk" within their portfolio –
We are Examined, Audited, plus most C.U.'s have a 3rd party vendor who provide ALM services. They review and make reports
to management and boards quarterly and those reports, are reviewed by examiners & auditors.

Concentration Risk policies have been required to be expanded over the last couple of years in order to require more detail and reporting.

I especially do not agree with the "Risk Weightings", as in a number of the areas they are unfair and will have a very negative impact on the outcome of
the capital ratio in many cases. Such as, when things that are fully insured (Investments, etc.) or money already expensed that are set aside in reserve accounts,
these items are risk weighted, so then they are used against us to negatively impact our Capital ratio.

Over the years, things have been allowed on balance sheets so credit unions could compete. It has allowed for more diversification
on our balance sheet so everything isn't concentrated into one pot in product or service. Yet now, based on "Risk Weightings" for certain types of products or
services because credit unions did that, they will now be penalized for it**.** **For the main reason, more complexity has been added to the
balance sheet over time, in order to stay competitive in order to improve income, and then in turn improve Capital, most everyone will be
penalized for it and now Capital will be negatively impacted because of it.**

I feel that (RBC2) is just another tool that will be used to justify the elimination of more credit unions, especially the smaller ones. As big and healthier credit unions get
bigger with mergers and unlimited expansion of membership for the entire state (giving them unfair advantages, which will produce lots of capital) , making it harder for
smaller credit unions to compete and improve capital.

Now after some of the roughest times in most credit unions history, they have continued to service and be relevant in the lives of their members in the best and worst times. Are finally pulling ahead and seeing some positive results, will once again be faced with closure because of the affects this proposal will have on their current "OK" now Capital position.

The Risk Based Capital proposal is not necessary or is needed for credit unions.
Please reconsider your recommendations.

Thank You.

Sincerely,

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