

From: [Phillip Crocker](#)
To: [Regulatory Comments](#)
Subject: Phillip Crocker - Comments on Proposed Rule: Risk-Based Capital (RBC2)
Date: Friday, April 24, 2015 12:42:41 PM
Attachments: [image002.png](#)
[image003.png](#)

Mr. Gerald Poliquin,

Thank you for allowing me the time to voice my opinion regarding the revised Risk-Based Capital Rule. As a devout advocate of the credit union movement I would like to comment on the potential upcoming Risk-Based Capital proposal in its updated form. I hope my comments will aid potential added improvements.

The current system works, credit unions came through the last Recession, the worst financial crisis since the Great Depression, just fine. Resource One has long demonstrated consistent growth since it was originally chartered, serving over 50,000 members. Although I believe NCUA has taken steps in the right direction to improve the original capital risk proposal, its revised format still seems to have flaws in its current state.

“The examiner discretion” to change an asset’s risk rating is a major flaw by NCUA. It is critical for credit unions to know objectively what their regulatory capital expectations are to better manage specific goals. We strongly oppose the capital adequacy plan requirements in RBC2. Strategic capital planning is very important for credit unions, and each credit union’s long-term desired capital ratio will depend on the credit union’s own assessment of the risks it faces, and it’s tolerance for risk.

I appreciate your willingness to allow me to express my comments on this revised impactful regulatory proposal. I respectfully encourage you to consider additional improvements to the proposed revised Risk-Based Capital (RBC2) Rule in accordance with my views included in this letter. Thank you again for the opportunity to voice my opinions and comments on the proposal.

Respectfully,



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