

From: [Terisa Chaney](#)
To: [Regulatory Comments](#)
Subject: Terisa Chaney - Comments on Proposed Rule: Risk-Based Capital (RBC2)
Date: Friday, April 24, 2015 1:09:17 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)

Dear Mr. Poliquin,

While I support requirements for credit unions to be strong financially, I believe this proposal could have a detrimental impact in the ability to grow. The NCUA needs to reconsider the proposed revised Risk-Based Capital Rule and I would like to comment conceivable alternatives, confident that amendments will be enacted.

Credit Unions have survived various economic downturns, such as the last Recession. Why is more capital needed, if during the Great Recession, credit unions proved that the movement had adequate capital? The excess capital will come at the expense of our members.

If RBC2 is designed to ensure adequate capital, then let the requirement stand on its own merits. Capital adequacy planning that individual credit unions do should not be subject to examination and supervision. Many credit unions use “complex” modeling scenarios which are built with overly conservative assumptions to start with, then compounded with worst- case event risks. This type of risk management oversight should be promoted in the credit union system. Models with worst-case scenarios are not realistic. This model output should not be used to force higher capital requirements.

I respectfully ask the NCUA to carefully review the proposed revised rule further, to either eradicate or alter certain guidelines for the development of all credit unions. Thank you again for allowing me the opportunity to convey my comments concerning the revised proposal.

Respectfully,



Terisa Chaney

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