

From: [Chris Howard](#)
To: [Regulatory Comments](#)
Subject: Comment on the Second Proposed Rule on Risk-Based Capital
Date: Monday, April 27, 2015 11:12:25 AM

Dear Mr. Poliquin,

This is one in a series of 12 substantive blog posts addressing the second Risk-based Capital proposal and published on CreditUnions.com over the last four weeks:

Rick Metsger: 45-year credit union member-owner, former credit union board member, former credit union consultant, professional politician, vice chairman of the NCUA. In his hands alone lies the future of risk-based capital for credit unions. *His is the only mind we have to change.*

Debbie Matz and Mark McWatters have votes, too, but they have too much invested to change their minds. Metsger is different, and he's smart enough to be wondering whether the NCUA staff is telling him the whole story.

As an old bank lobbyist, I loved a challenge like this. One single target. One basic message. One clear action required. Rarely is a government relations task this simple. Of course, simple does not automatically mean easy, but it does almost always mean doable. And so it is here.

One of the most powerful lessons I learned while lobbying is that politicians are very responsive to those whom they see as their constituents and always value old friends over new ones as trusted counsel. Metsger is a politician. He's also a credit union guy. We know who his old friends are. We know how to reach him and how to deliver our message.

First, we need to reach out to those among us who know Rick and urge them to tell him the truth about this proposal — to take him through the details so he can see it through the eyes of a credit union member-owner and director. To resonate, this message has to be delivered by people he knows, trusts, and respects.

Second — and we can each do this whether we know Metsger or not — we must each act ourselves, in overwhelming numbers, to make our position clear: this proposal is bad for credit unions and bad for credit union member-owners. Filing comments is critical. It's not just about "voting," it's also about giving Rick Metsger the political cover he needs to buck Chairman Matz and vote against the proposal.

When RBC is implemented, Matz will be long gone. Metsger won't be. When the excrement hits the fan and someone gets up the gumption to sue the NCUA for acting illegally, Metsger will be the one person around who could have stopped things and didn't. This will become *his* legacy. As a politician, he will understand the ramifications of this, but only if we make them clear.

This is our responsibility. If we fail, we can't be angry with Metsger. We will have only ourselves to blame.

Whether you're for the new RBC rule or against it, your comment is your vote.

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