

From: [Erika Y Reyes](#)
To: [Regulatory Comments](#)
Subject: Erika Reyes-Risk-Based Capital (RBC2)
Date: Monday, April 27, 2015 11:37:26 AM
Attachments: [image002.png](#)
[image003.png](#)

Dear Mr. Poliquin,

As an employee of Resource One, I would like to take the time to address my personal concerns regarding the revised Risk-Based Capital proposal. While I support the requirements for credit unions to be financially healthy, the updated proposal would instead have an adverse effect on the movement. I would like to express my concerns on RBC2 and its flaws to express my disapproval even in its updated context.

The National Credit Union Administration has not demonstrated problems related to current prompt corrective action (PCA) regulation, other than a few isolated incidents. Credit unions have long positioned themselves to be able to withstand economic hardships. The RBC2 proposal is hurting instead of helping the financial health of credit unions.

Removing the interest rate risk (IRR) from this proposed regulation was crucial, but NCUA has stated that there will be further IRR regulation forthcoming. Please consider that there already are current regulations that address IRR adequately. Do not add to the regulatory burden that already faces credit unions today.

RBC2 proposal increased this threshold from \$50 million to \$100 million. There are still concerns with the approach of defining credit unions as complex simply based on asset size. NCUA should define complex with factors such as deposit account types, member services, loan and investment types, and portfolio composition. We feel this approach is more consistent with the Federal Credit Union Act which requires NCUA to consider "the portfolio of assets and liabilities" of credit unions when determining whether they are "complex."

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.

Thank You,



Erika Reyes

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