

From: [Elizabeth Seelbach](#)
To: [Regulatory Comments](#)
Subject: Elizabeth Seelbach – Comments on Proposed Rule: Risk-Based Capital (RBC2)
Date: Monday, April 27, 2015 10:27:11 AM
Attachments: [image002.png](#)
[image003.png](#)

As an employee of the Resource One, this letter represents my views regarding the NCUA's revised Risk-Based Capital rule. Although it is commendable in theory, it would leave detrimental outcomes. I fully support the concept for risk-based capital for credit unions, but would like to voice my concern and offer the following comments with the intention on more improvement given its oversights.

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 reformed RBC2 proposal states that NCUA can impose additional capital requirements on individual credit unions if the Agency raises additional supervisory concerns. RBC2 would also add a requirement that a "complex" credit union maintain capital commensurate with the level and nature of all its risks, and have a process to determine its capital adequacy in light of its risk, as well as develop a comprehensive written strategy to maintain "an appropriate level of capital." Such a plan should not be the subject of examination and supervision, and the goals a credit union establishes for its own capital sufficiency should not become targets or standards in an examination.

I conclude that although the revised proposal is admirable in theory, but modifications need to be made. I ask that the proposed rule be reexamined and be refined to allow all credit unions to continue serving their members' needs.



Elizabeth Seelbach

Website & Marketing Manager | Marketing

Member/Owner since 2006

p: 214-565-5323 | f: 214-292-0713

www.r1cu.org | [f](#) [in](#)



CONFIDENTIALITY NOTICE The information in this e-mail may be confidential and/or privileged. This e-mail is intended to be reviewed by only the individual or organization named above. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this

email and its attachments, if any, or the information contained herein is prohibited. If you have received this e-mail in error, please immediately notify the sender by return e-mail and delete this e-mail from your system.

This e-mail and any attachments may contain confidential information. If you are not the intended recipient, please notify the sender immediately by return e-mail, delete this e-mail and destroy any copies. Any dissemination or use of this information by a person other than the intended recipient is unauthorized and may be illegal. Resource One Credit Union reserves the right to monitor all e-mail communications through its networks for quality control purposes.