

Regulatory Comments

From: Jennifer Davis <no-reply@cuanswers.com>
Sent: Monday, April 27, 2015 4:30 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: Jennifer Davis
Callahan & Associates

04/27/2015

Dear Mr. Poliquin:

Attn: Mr. Gerard Poliquin, Secretary, NCUA Board

I believe the revised RBC rule penalizes credit unions for specific activities such as real estate lending, member business lending, and credit unions chartered to assist the un-bankable by placing a capital tax on the resulting assets of low income or poor credit lending. We believe the end result will be thousands of homogenous balance sheets in 2025 that you can easily understand from a supervisory perspective. However, this current risk posture of the NCUA cannot fail but to lead credit unions to shy away from diversity or cooperative reason for the charter and field of membership. The end result of this rule will ultimately force credit unions into potential areas of investment and lending that the credit union lacks experience with or create industry wide concentrations that could be impacted by similar economic variables. In and of itself, this rule creates more risk than it proposes to control.

A handwritten signature in black ink, appearing to be 'JD' followed by a long horizontal line.

Jennifer Davis
Callahan & Associates