

**From:** [Joyce Jones](#)  
**To:** [Regulatory Comments](#)  
**Subject:** RBC2 Comments  
**Date:** Monday, April 27, 2015 5:20:43 PM  
**Importance:** High

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To: Regulatory Comments  
From: Joyce R. Jones  
GenFed Financial Credit Union, Inc.  
04/27/2015

Dear Mr. Poliquin:

We certainly appreciate the opportunity to share thoughts on NCUA's proposed RBC2 ruling. Thank you for the comment period. Unfortunately, we must oppose RBC2, as we opposed the original RBC proposed ruling. The cooperative model has proven successful for credit unions. Why tamper with success? The RBC2 ruling would disrupt and threaten the cooperative nature of our credit union, and all other credit unions. Why would we want to copy a bank's structure for capital requirements?

We offer cutting edge services and features at lower costs to our members, yet our members' (and all credit union members') unique option for affordable financial security through credit union cooperatives will be adversely impacted if we must act, think, or react like a bank due to the imposition of RBC2. Congress never intended for the NCUA to develop rules that do not consider the diversity of credit unions. The proposed arbitrary asset cut-off point is contrary to the mission of Congress. The NCUA was to keep in mind the special nature of the relationship between credit union members and their credit union.

We believe the RBC2 rule is over-reaching and one-size-fits-all, which is not a good direction for the unique nature of credit unions! This proposed ruling, even the second version, undermines our credit union's (and every credit union's) cooperative structure, which is what makes us viable, strong, and attractive to many consumers in the aftermath of a financial crisis, NOT caused by credit unions. We vote that the rule be thrown out in entirety. If not, we strongly request that the NCUA further amend the proposal to include the following:

- Dropping the new proposed capital adequacy provisions, which are beyond net worth and risk-based capital ratio requirements;
- Reduction of a number of the risk weights;
- Expansion of the conditions under which goodwill could be included in the risk-based capital ratio;
- Minimizing the burden of expanding the call report for purposes of RBC2; and
- Allowing credit unions to use supplemental capital in meeting risk-based capital requirements.

Sincerely,

**Joyce R. Jones**  
**President/CEO**  
**GenFed Financial Credit Union**

**Joyce Jones**  
CEO, President

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