

**From:** [Terry Tucker](#)  
**To:** [Regulatory Comments](#)  
**Cc:** ["Suzanne Yashewski"](#)  
**Subject:** Comment RBC2  
**Date:** Monday, April 27, 2015 5:53:35 PM

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April 27, 2015

Mr. Gerard Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428

Dear Mr. Poliquin,

I have a different background from most of the people you will be hearing from regarding proposed RBC2. I was a commercial banker for 12 years while working for 3 different banks in 11 different locations and two different cities. You will no doubt receive some very elaborate comments from many different sources regarding the proposed RBC2. I know you will take those into consideration. This comment will be much shorter and to the point than those comment letters will be.

When I left banking and went to my first credit union, the ability credit unions had of serving their members was captivating to me. I was amazed how they

have served a niche for almost a century like no other financial entity. Two of the things which have brought that about is the unique cooperative spirit and philosophy that credit unions possess. That said, I must wonder, we all must wonder.....what is to be gained by writing regulations that will do so much to make credit unions look and act like banks? Quite simply, for almost 100 years, the responsibility for managing credit unions well....has fallen on the shoulders of the Volunteer Board of Directors, Management, and staff of the individual credit unions. And that has worked very, very well. The risk of not doing well, is to be closed or merged as they should be when they are poorly managed. However, if it is systemic risk that is motivating these proposed regulations, then we all REALLY KNOW that the Real Risk to the credit union system comes from a very few, very large credit unions. If that is the problem, then we need to do some more searching for solutions. RBC2 if put into effect will cause much unnecessary work and expense for a large majority of credit unions. Please consider the cost versus the benefit to the members and the system as a whole. In my mind, this is a very unnecessary regulation. We have done quite well without it for nearly 100 years.

I just really hate to see unnecessary, unproductive additional regulations passed for the entire system, when capital may not be the problem at all. Credit unions work and they work well. Please do not turn them into banks. I truly believe that RBC2 in its present form, if passed into regulation will do exactly that over time.

*Ferry Tucker*, Operations Manager

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