

From: [Driver, Wendy](#)
To: [Regulatory Comments](#)
Subject: Risk Based Capital 12 CFR Parts 701, 702, 703, 713, 723 and 747
Date: Monday, April 27, 2015 4:20:03 PM

Dear Mr. Gerard Poliquin, Secretary of the Board, NCUA:

I would like to take the opportunity to comment on the NCUA's Proposed Rule on Risk-Based Capital. While my comments will be short compared to most, I would like to notate that I disagree with the revised proposed rule. As the CEO of a small credit union (\$45 million in assets), I disagree that this rule is necessary. Risk-Based Capital should be a model, not a rule. Effective supervision and risk management techniques can be used to control risk without a mandatory rule. I don't feel this proposed rule will truly enhance safety and soundness. I don't believe a bank model is appropriate for use by credit unions. While I commend the NCUA for changing the threshold of a complex credit union to one which holds more than \$100 million in assets, I disagree with the threshold amount: it should be at a minimum \$500 million in assets.

Thank you for the opportunity to provide comments.

Sincerely,

Wendy Driver

Wendy Driver

CEO



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