

**From:** [Chrysti Petersen](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Chrysti Petersen - Comments on Proposed Rule: Risk-Based Capital (RBC2)  
**Date:** Monday, April 27, 2015 2:17:01 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Dear Mr. Poliquin,

I would like to voice my concern on the RBC2 proposal and offer the following comments with the intent for further improvement. Although Resource One is well capitalized under both measures, our margin under the proposed risk based formula is reduced. I fully support the concept for risk-based capital for credit unions in its revised structure, but still believe there is room for added improvements.

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.

RBC2 proposal increased this threshold from \$50 million to \$100 million. There are still concerns with the approach of defining credit unions as complex simply based on asset size. NCUA should define complex with factors such as deposit account types, member services, loan and investment types, and portfolio composition. We feel this approach is more consistent with the Federal Credit Union Act which requires NCUA to consider “the portfolio of assets and liabilities” of credit unions when determining whether they are “complex.”

I appreciate the opportunity to voice my concerns regarding revised Risk-Based Capital proposal. I sincerely hope you take my comments and views into considerations for possible improvements on the proposal.

Respectfully,



**Chrysti Petersen, CRCM, CAMS**

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