

From: [David Van Buskirk](#)
To: [Regulatory Comments](#)
Subject: David Van Buskirk - Comments on Proposed Rule: RBC2
Date: Monday, April 27, 2015 1:45:17 PM
Attachments: [image002.png](#)
[image003.png](#)
Importance: High

Dear Mr. Poliquin,

As an employee and Branch Manager of Resource One Credit Union, this letter represents my views regarding the NCUA's revised Risk-Based Capital rule. Although it is commendable in theory, it would leave detrimental outcomes. I fully support the concept for risk-based capital for credit unions, but would like to voice my concern and offer the following comments with the intention on more improvement given its oversights.

Credit Unions have survived various economic downturns, such as the last Recession. Why is more capital needed, if during the Great Recession, credit unions proved that the movement had adequate capital? The excess capital will come at the expense of our members.

Removing the interest rate risk (IRR) from this proposed regulation was crucial, but NCUA has stated that there will be further IRR regulation forthcoming. Please consider that there already are current regulations that address IRR adequately. Do not add to the regulatory burden that already faces credit unions today.

I respectfully ask the NCUA to carefully review the proposed revised rule further, to either eradicate or alter certain guidelines for the development of all credit unions. Thank you again for allowing me the opportunity to convey my comments concerning the revised proposal.

Respectfully,



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