

**From:** [John Buckley](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [syashewski@cornerstoneleague.coop](mailto:syashewski@cornerstoneleague.coop); [Wayne Mansur - TEXOMA COMMUNITY](#)  
**Subject:** John Buckley— Comments on Proposed Rule: Risk Based Capital (RBC2)  
**Date:** Monday, April 27, 2015 2:50:58 PM

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My name is John Buckley and I am currently privileged to serve as the Chief Operations Officer for Texoma Community Credit Union in Wichita Falls, Texas. My experience spans over thirty years, all within the Credit Union movement. I began while in college as a part-time teller and worked my way up to CEO prior to my current position. I have a vast knowledge of credit unions and a passion for the movement. My initial thoughts of the proposed NCUA Risk Based Capital (RBC1&2), reminded me of the Savings and Loan industry in the late 80's when FDIC changed capital requirements which eventually destroyed the industry. Although it should be noted other critical factors certainly were in play, I believe over sweeping government intervention and regulations did cause the eventual clasp of the industry.

My comments are simple, if it's not broke, don't fix it. Credit unions as a whole remain very strong, stable and are performing very well overall. If a problem exists, take care of that issue individually but don't penalize the entire movement. Capital levels cannot just arbitrarily be increased. Supplemental Capital would have to be included and allowed like banks. We are different from Banks and operate for the betterment of our members not the compensated Board of Directors and Shareholders. Don't feel changes to the credit union movement should be made to make us similar. Under the FCU Act, NCUA is required to take into account the unique nature of credit unions and this overall proposal is simply contrary to that statute. I am adamantly opposed to any provisions for any type of Risk Based Capital Requirements.

Thank you for your time and consideration,

**John Buckley**  
**Chief Operations Officer**  
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