

From: [Michael C. Moore](#)
To: [Regulatory Comments](#)
Subject: Michael Moore - Comments on Proposed Rule: Risk-Based Capital (RBC2)
Date: Monday, April 27, 2015 3:05:18 PM
Attachments: [image002.png](#)
[image003.png](#)

Dear Mr. Poliquin,

As an employee of Resource One, I would like to take the time to address my personal concerns regarding the revised Risk-Based Capital proposal. While I support the requirements for credit unions to be financially healthy, the updated proposal would continue to have an adverse effect on the credit union movement. I would like to express my concerns on RBC2 and its flaws to express my disapproval even in its updated context.

NCUA's rationale for proposing a new risk-based capital rule was to make the RBC system for credit unions more comparable to bank RBC requirements. There is no justification that suggests credit unions were undercapitalized considering their ability to withstand the recent financial crisis and Great Recession compared to banks.

If the RBC2 proposal is implemented, NCUA would assume authority to subjectively impose higher capital requirements on individual credit unions. Examining possible reasons for higher capital standards in the proposal, there seems to be a discrepancy and inconsistency from credit union to credit union. Strategic capital planning is very important for credit unions, and each credit union's long-term desired capital ratio will depend on the credit union's own assessment of the risks it faces, and its tolerance for risk.

I appreciate your willingness to allow me to express my comments on this revised impactful regulatory proposal. I respectfully encourage you to consider additional improvements to the proposed revised Risk-Based Capital (RBC2) Rule in accordance with my views included in this letter. Thank you again for the opportunity to voice my opinions and comments on the proposal.

Respectfully,



Michael Moore

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