

**From:** [Tami Winkler](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk Based Capital Comment  
**Date:** Monday, April 27, 2015 2:34:36 PM

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Dear Mr. Poliquin:

The risk based capital rules will take resources away from helping our members, needlessly, through increased reserves. Resources that are needed desperately to help our members. Credit Unions should be celebrating how well they weathered the financial crisis. This is a solution for problem that doesn't exist. The more the regulators treat credit unions like banks, the more they will be viewed as banks. This doesn't help distinguish our role and show how unique Credit Unions are in the lives of our members. I would suggest using the capital requirements as guidelines for credit unions to use, not law.

Thank you.

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