

**From:** [Rebecca Wessler](#)  
**To:** [Regulatory Comments](#)  
**Subject:** member feedback regarding the risk-based capital proposal  
**Date:** Monday, April 27, 2015 12:44:36 PM

---

Dear Mr. Poliquin,

I have been a member in the credit union system since I was in my early 20s and have been a member of State Department FCU for the past two years. I am writing now to urge you to reject the proposed risk-based capital rule that is before you.

I am proud of the legacy credit unions leave from one generation to the next. We survive and thrive based on the ability to respond to and serve the needs of distinct memberships. Our missions extend far beyond opening checking accounts and making loans. Although it is easy to lump all providers of financial services into one family for comparisons sake, credit unions serve a different purpose from our banking brethren. As such, we require a different kind of oversight - one that maximizes the benefits inherent in a cooperative system.

I understand the NCUA must have the ability to monitor and regulate credit union activities. It's a tough, frequently thankless, job. I also believe that everyone at the NCUA wants to do what's best to ensure the strongest possible system for cooperative financial services.

However, the RBC rule as proposed is not the way to meet this objective. It is overly broad and burdensome. It attempts to solve a problem that I haven't seen proven actually exists by implementing the kind of rule that banking regulators have called "fundamentally flawed." Moreover, it fails to take into consideration the fundamental question on which each and every credit union must base its decision-making: What is in the best interest of the member?

There are more than 6,000 credit unions. How can one rule adequately address the different needs of all those memberships?

Please consider using RBC as a guideline to kick-off productive conversations with credit union leadership and conduct sound examinations. There's a place for risk-based capital decisions to be made, but it is at the local -- not national -- level.

Thank you for your time.  
Rebecca Wessler