

From: [Allyn VanDyk](#)
To: [Regulatory Comments](#)
Subject: Risk-Based Capital Comment
Date: Wednesday, February 04, 2015 12:57:26 PM

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From: Allyn VanDyk
CU*Answers

02/04/2015

Dear Mr. Poliquin:

It is obvious from the reading the your revised Risk Based Capital proposal, that the NCUA has still failed to understand the diverse nature of Credit Unions and the services they provide to our citizens. History has shown that the cooperative model of credit unions is a successful one. The diverse nature of our charters has meant that despite little capital—except member good will and loyalty—the forefathers and current stakeholders of the industry have built the second largest financial system in America today, serving close to 40 million households with savings of nearly \$1 trillion. The proposed rule will serve to hinder that diversity by placing credit unions into more general categories. I urge you to rethink this entirely and protect the true nature of credit unions by ending this rule so we can celebrate the charters that made this industry possible, from the \$60 billion Navy FCU to any of the \$1-5 million “family” credit unions. From the farming communities of South Dakota serving family farms with loans to the taxi drivers from NYC to San Francisco. From the raw recruit in San Diego to the forward deployed military professional in Diego Garcia, Korea, or Afghanistan. From the auto worker in Detroit or Tennessee to the high tech communities of Silicon Valley.



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