

**From:** [Bret Weekes](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk-Based Capital Comment  
**Date:** Thursday, February 05, 2015 9:07:28 AM

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From: Bret Weekes  
eDOC Innovatations

02/05/2015

Dear Mr. Poliquin:

I believe that credit unions, and NCUA, would be served better if the formulas and risk weights within RBC were not given the force of law. Forcing credit unions to institute changes, some potentially drastic and unwarranted, into their business practices and management of their balance sheets to comply with these arbitrary weights I believe will impede the success of credit unions without any substantive benefit. A look back to the financial crisis, and its causes, is wise and prudent, and I commend NCUA for due consideration. However, there is no evidence that a force of RBC arbitrary weights into law would provide any contribution to such an event happening again. To the contrary, such action will only slow the economic development of the industry.



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