

From: [Judith VanDyk](#)
To: [Regulatory Comments](#)
Subject: Risk-Based Capital Comment
Date: Wednesday, February 04, 2015 5:33:28 PM

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From: Judith VanDyk
Honor Credit Union

02/04/2015

Dear Mr. Poliquin:

The NCUA is straining hard to justify its legal interpretation of a Rule that has significant practical problems. The \$100,000 asset size cut off is arbitrary. The risk weighting is arbitrary. Adherence to this rule could cause credit unions to build up concentrations in assets that turn out to be risky. Why doesn't the NCUA allow for a rule that allows for supplemental capital, which would likely be far greater benefit to the industry and greatly reduce the risk to the Share Insurance Fund? Finally, why should the industry accept RBC when it suffers from these problems and may very well be an overextension of the NCUA's authority in any event?



Judith VanDyk
Honor Credit Union