

**From:** [Dawn Moore](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk-Based Capital Comment  
**Date:** Tuesday, February 10, 2015 8:54:20 AM

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From: Dawn Moore  
CU\*Answers

02/10/2015

Dear Mr. Poliquin:

For those of us who remember when the airline industry went into crisis with mergers and failures, their credit unions survived to serve their members; when the auto industry closed plants and had layoffs, their credit unions converted to communities to be there for the workers and families; when the housing crisis hit in California, Florida, and Arizona, credit unions rewrote billions of mortgage loans to keep people in their homes until they got back on their feet. The rule undermines the core of credit union effectiveness by having government rules, not the member-owner's well-being, be the focus of business strategy.

I would like to recommend that the NCUA truly believes that this rule will uncover the outliers and those credit unions that should operate with higher levels of capital than make this rule a test similar to those currently being performed like the 17/4. The OCC has numerous ratios and tests which they perform based upon call report information such as the canary ratios. These ratios are designed to uncover outliers and direct supervision in these areas to review.

We must stop the debate about the nuances of the rule and convince the NCUA, after outlining the substantial objections, that the modeling approach needs to be tested and tried in the examination process as a tool and then the results shared with the industry before suggesting that a model be embedded in a law.



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