
From: James Vickers <no-reply@cuanswers.com>
Sent: Friday, February 13, 2015 1:54 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: James Vickers
Lake Michigan CU

02/13/2015

Dear Mr. Poliquin:

As pointed out in the Hon. J. Mark McWatters' dissent, the NCUA has pivoted away from its own long-standing interpretation of Section 216(d) of the Federal Credit Union Act. In 2007, the NCUA asked Congress to amend the regulation because you said the NCUA needed additional authority to create a two-tiered Risk Based Capital test. Can you explain why you suddenly believe the NCUA has the authority to do so, when your past practice has been the exact opposite?

A handwritten signature in black ink that reads "James C. Vickers". The signature is written in a cursive, slightly slanted style.

James Vickers
Lake Michigan CU