

## Regulatory Comments

---

**From:** Chris Shelton <no-reply@cuanswers.com>  
**Sent:** Friday, February 27, 2015 2:16 PM  
**To:** \_Regulatory Comments  
**Subject:** Risk-Based Capital Comment

To: Regulatory Comments  
From: Chris Shelton  
CU\*Answers

02/27/2015

Dear Mr. Poliquin:

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. 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.

The NCUA and the credit union industry would both be served better if the formulas and risk weights within RBC were not given the force of law. Do not force my credit union to institute changes both potentially drastic and unwarranted in our balance sheet to meet these arbitrary weights.

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.

A large, bold, black handwritten signature, likely of Chris Shelton, written in a cursive style.

Chris Shelton  
CU\*Answers