

Regulatory Comments

From: Dennis Luy <no-reply@cuanswers.com>
Sent: Friday, February 27, 2015 5:18 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: Dennis Luy
Cu*NorthWest

02/27/2015

Dear Mr. Poliquin:

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.

A handwritten signature in black ink that reads "Dennis Luy". The signature is written in a cursive, somewhat stylized font. The first letter 'D' is large and loops around. The rest of the name is written in a more fluid, connected script.

Dennis Luy
Cu*NorthWest