

Regulatory Comments

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

To: Regulatory Comments
From: Kurt Hansen
CU*Answers

02/27/2015

Dear Mr. Poliquin:

Congress intended for the NCUA to develop rules around credit union complexity that would take into account the diversity of credit unions. An arbitrary asset cut-off point is contrary to the mission Congress provided to the NCUA, which is to take in account the special nature of my members' relationship with my credit union.

The NCUA should reconsider implementing a two-tiered RBNW that is at odds with the agency's past interpretation of its powers, and which conflicts with the plain language and intent of Congress. Not only has an NCUA Board Member strongly dissented from the NCUA's proposed Rule, but the legal foundation the NCUA is relying upon is weak. Much of the weaknesses in the NCUA's arguments can be found directly in the memo prepared by the Paul Hastings, LLP, law firm, for the NCUA Board.

A handwritten signature in black ink, appearing to read 'Kurt Hansen', written in a cursive style.

Kurt Hansen
CU*Answers