

## Regulatory Comments

---

**From:** Ray VanRiette <no-reply@cuanswers.com>  
**Sent:** Friday, February 27, 2015 2:58 PM  
**To:** \_Regulatory Comments  
**Subject:** Risk-Based Capital Comment

To: Regulatory Comments  
From: Ray VanRiette  
CU\*Answers

02/27/2015

Dear Mr. Poliquin:

Our credit union believes the RBC2 rule would undermine the cooperative and diverse nature of our charters by creating a one size fits all over-reaching capital formula. A cooperative is a group of people banding together to own a business that will always meet their specific needs. The arguments and logic of the rule are misguided, and do not hit the target they aim for. Because of this I would respectfully recommend the rule be thrown out.

When the airline industry went into crisis with mergers and failures, their credit unions survived to serve their members. We saw the same again when the auto industry was closing plants, and with the housing crises in the Southwest. Credit unions rewrote billions of mortgage loans to keep people in their homes until they got back on their feet.

This process works!

Credit unions are about groups of people coming together and making opportunities for everyone to benefit. We feel strongly that this rule undermines what we are, and threatens the well-being of all our members.

A handwritten signature in black ink that reads "Ray VanRiette". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Ray VanRiette  
CU\*Answers