

Regulatory Comments

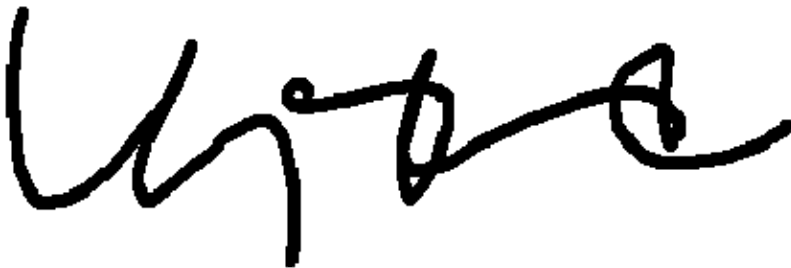
From: Kimberly Youngblood <no-reply@cuanswers.com>
Sent: Monday, March 09, 2015 12:22 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: Kimberly Youngblood
FOCUS Credit Union

03/09/2015

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. This is a massive flaw of the NCUA's structure as regulator and insurer. We believe this is a myopic view of cooperatives and only considers our equity funding mechanism. A cooperative is a like group of individuals banding together to own a business that is guaranteed to meet their similar financial needs. The arguments and logic of the rule misapplies what is done successfully at a local or institutional level, to an entire system. Because of this I would respectfully recommend the rule be thrown out and at best become a matrix the NCUA would use in the exam process only.



Kimberly Youngblood
FOCUS Credit Union