

Regulatory Comments

From: Michael Joplin <no-reply@cuanswers.com>
Sent: Monday, March 09, 2015 1:41 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: Michael Joplin
CU Revest

03/09/2015

Dear Mr. Poliquin:

As pointed out in the Hon. J. Mark McWatters' dissent, the NCUA has pivoted away from its own long-standing interpretation of Section 216(d) of the Federal Credit Union Act. In 2007, the NCUA asked Congress to amend the regulation because you said the NCUA needed additional authority to create a two-tiered Risk Based Capital test. Can you explain why you suddenly believe the NCUA has the authority to do so, when your past practice has been the exact opposite?



Michael Joplin
CU Revest