

Regulatory Comments

From: Raechelle Joplin <no-reply@cuanswers.com>
Sent: Monday, March 09, 2015 1:44 PM
To: _Regulatory Comments
Subject: Risk-Based Capital Comment

To: Regulatory Comments
From: Raechelle Joplin
CU Revest LLC

03/09/2015

Dear Mr. Poliquin:

The NCUA and the credit union industry would both be served better if the formulas and risk weights within RBC were not given the force of law. Do not force my credit union to institute changes both potentially drastic and unwarranted in our balance sheet to meet these arbitrary weights.

As mentioned by the Hon J. Mark McWatters, the NCUA cannot just “piggyback” on to the FDIC unless they have the authority from Congress to do so. The plain language of the statute contradicts the NCUA’s interpretation. After all, if the NCUA was to be given the same PCA authority as the FDIC, Congress could have done exactly that. The clear intent of Congress was to create a separate system for our industry, and the NCUA must operate within those confines.



Raechelle Joplin
CU Revest LLC