From:	Gabriel Meyr
To:	_Regulatory Comments
Subject:	NCUA Risk-Based Capital Proposal Comment
Date:	Wednesday, March 25, 2015 2:10:29 PM

Hello NCUA,

I joined Utah Community Credit Union about 3 years ago when I was in college. Now I live in DC where I am a member of Library of Congress Federal Credit Union and work for Callahan & Associates on the website CreditUnions.com.

In my time on the member side of credit unions and on the business side, helping to publish case studies about how credit unions can be most effective, I have come to appreciate their unique position and power to help members get a leg up on financial services that may be otherwise intimidating and maybe unreachable.

To be intimidating or out-of-touch is antithetical to the cooperative movement, so I am troubled to see its regulator acting in such ways. The revised risk-based capital proposal is a bad solution for a problem that many top minds in the industry believe does not exist. Even if the problem were real, the precedent of the Basel rules and the FDIC's later admission that they failed should be enough to cause the NCUA try to come up with a different solution.

Yet that does not seem to be what your organization is doing. From your reluctance to release legal opinions, to your failure to respond to important criticisms—not just from industry leaders but from one of your own board members—your plan seems to be to allow the bulk of the proposal to intimidate the industry away from weighing in and to force bureaucratic powers that you may not even have to push this rule through into law.

I am strongly against implementation of the revised risk-based capital rule, and ask that you abandon it.

Sincerely,

Gabriel Meyr