

## **Regulatory Comments**

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**From:** Lynn Baker <no-reply@cuanswers.com>  
**Sent:** Friday, March 27, 2015 1:19 PM  
**To:** \_Regulatory Comments  
**Subject:** Risk-Based Capital Comment

To: Regulatory Comments  
From: Lynn Baker  
Frankenmuth Credit Union

03/27/2015

Dear Mr. Poliquin:

Congress intended for the NCUA to develop rules around credit union complexity that would take into account the diversity of credit unions. An arbitrary asset cut-off point is contrary to the mission Congress provided to the NCUA, which is to take in account the special nature of my members' relationship with my credit union.

We must stop the debate about the nuances of the rule and convince the NCUA, after outlining the substantial objections, that the modeling approach needs to be tested and tried in the examination process as a tool and then the results shared with the industry before suggesting that a model be embedded in a law.

Lynn Baker  
Frankenmuth Credit Union