

**From:** [Cody Trebil](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk-Based Capital Rule  
**Date:** Wednesday, April 01, 2015 9:39:38 AM

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Good morning,

I am an employee of Wright-Patt Credit Union, Inc., in Beavercreek, Ohio. I have been an employee here for three years and have seen firsthand the difference a well-run credit union can make in the lives of members.

I am writing to ask that NCUA not implement its proposed rule on risk-based capital. Simply put, the proposed rule is counterproductive for credit unions. Wright-Patt Credit Union has always been very strong and has consistently made beneficial decisions for members. The new risk based capital rule will change the way our Board and Management make decisions on how best to serve members, and I don't believe the new rule provides any benefit over the current capital rules we've operated under for many years.

I am also concerned that the NCUA rule is very much like capital rules used for for-profit banks. Credit unions are clearly not for-profit banks, and should not be regulated the same as banks. Imposing such unnecessary regulations on credit unions could potentially deal a stifling blow to the impact credit unions have in their local communities. Credit unions have been key drivers of job growth in many communities during the sluggish growth in the broader economy. Making it more difficult for credit unions to operate is not the kind of regulation that the NCUA should be proposing.

We have done an impeccable job serving members for a long time, yet we are burdened with more and more regulations every year. This one, the risk-based capital rule, just isn't necessary and is at best an unjustified punishment against credit unions. Please don't implement it.

Respectfully,  
Cody Trebil  
Wright-Patt Credit Union, Inc.

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