

**From:** [Darrick Weeks](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk Based Capital Rule - Please Don't Implement It!  
**Date:** Tuesday, March 31, 2015 4:29:37 PM

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Good afternoon,

I am an employee of Wright-Patt Credit Union, Inc., in Beavercreek, Ohio. I have been an employee here for nearly 5 years and in credit unions almost 20 years now.

I am writing to ask that NCUA not implement its proposed rule on risk-based capital. I don't think this proposal is good for credit unions or our members. Wright-Patt Credit Union has always been very strong as have the other credit unions I've worked for. These organizations have made and continue to make good decisions for members. I think the new risk based capital rule will change the way our Board and Management make decisions on how best to serve members and don't believe the new rule provides any benefit over the current capital rules we've operated under for many years. Simply, it is too broad a brush to paint all credit unions with.

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, and should not be regulated the same as banks. We have done a great job serving members for a long time, yet we are given more and more rules every year. Unfortunately the one who bears these costs is our members. This one in particular, the risk-based capital rule, just isn't necessary. Please don't implement it.

Respectfully,  
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