

From: [John Haller](#)
To: [Regulatory Comments](#)
Subject: Proposed capital risk management rule
Date: Wednesday, April 01, 2015 11:05:22 AM
Attachments: [John Haller.vcf](#)

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Good morning,

My name is John Haller and I am an employee of Wright-Patt Credit Union, Inc., in Beavercreek, Ohio. I have been an employee here for 5 years and have been a member of Wright-Patt Credit Union for 33 years.

I am writing to ask that NCUA reconsider its position and not implement the proposed rule on risk-based capital. I do not think this proposal is good for credit unions nor do I believe it is necessary. In my experience, Wright-Patt Credit Union has always been very strong and has made 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 do not 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 to regulate the behavior of "for-profit" banks. Since credit unions are clearly not managed the same as "for-profit" banks, they should not be regulated the same as banks.

We have done a great job serving members for a long time, yet we are subjected to more and more rules every year. This one, the risk-based capital rule, simply is not necessary. Please reconsider your proposal and do not implement it.

Respectfully,

John Haller

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