

**From:** [JB Jessica Robinson](#)  
**To:** [Regulatory Comments](#)  
**Subject:** NCUA proposal for Risk Based Capital  
**Date:** Wednesday, April 01, 2015 10:05:14 AM  
**Attachments:** [IMAGE.BMP](#)

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To whom it may concern;

I am currently an employee of Wright-Patt Credit Union, Inc. in Beavercreek, OH. I have been an employee of this wonderful cooperative for the last 14 years.

Recently, our President and CEO took the time to explain the proposed rule on risk-based capital that NCUA is wanting to implement. From the information I have read, I feel that this would not be a good move for a majority of credit unions out there. WPCU has a history of making good decisions and is financially sound when it comes to servicing our members the best way possible. The three stake-holder model is always at the front of our decisions: what is best for our member-owners, employees, and WPCU as an organization. The proposed rule will have a major impact on the ability for our Board Members and Senior Leadership to make decisions on how to best serve our members, and does not provide any value over the current capital rules we have operated under in the past.

There is also a concern that this NCUA rule is mirrored much to close to the rules used for "for-profit" banks. WPCU and other credit unions alike are clearly not operated like banks, and therefore should not be regulated in the same manner.

We at WPCU have done a great job of servicing our members for quite some time. However, it seems that there are an increased number of rules that we are required to follow each year. This rule especially just does not seem necessary based on how we run our operations, so please do not implement it at this time.

Respectfully Yours,

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