

## Regulatory Comments

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**From:** Anne Brickel <no-reply@cuanswers.com>  
**Sent:** Thursday, April 02, 2015 1:15 PM  
**To:** \_Regulatory Comments  
**Subject:** Risk-Based Capital Comment

To: Regulatory Comments  
From: Anne Brickel  
Frankenmuth Credit Union

04/02/2015

Dear Mr. Poliquin:

Our credit union believes the RBC2 rule would undermine the cooperative and diverse nature of our charters by creating a one size fits all over-reaching capital formula. This is a massive flaw of the NCUA's structure as regulator and insurer. We believe this is a myopic view of cooperatives and only considers our equity funding mechanism. A cooperative is a like group of individuals banding together to own a business that is guaranteed to meet their similar financial needs. The arguments and logic of the rule misapplies what is done successfully at a local or institutional level, to an entire system. Because of this I would respectfully recommend the rule be thrown out and at best become a matrix the NCUA would use in the exam process only.

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.

A handwritten signature in black ink that reads "Anne Brickel" followed by a period. The signature is written in a cursive, slightly slanted style.

Anne Brickel  
Frankenmuth Credit Union