

**From:** [Alix Patterson](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments on RBC Rule  
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I am writing as a member-owner of Digital Credit Union to ask that you withdraw the proposed RBC legislation. The proposed rule's one-size-fits-all approach treats our credit unions as if they were banks, ignoring the fundamental differences in structure and ownership. Even the FDIC's Vice Chairman thinks a Risk-Based Capital approach is a bad idea!

By implementing the rule, you won't serve our interests, our members', or the NCUSIF's; you'll only be creating a bigger mess for later. If your goal is to protect the NCUSIF, why implement a rule that will make it harder for credit unions to provide high quality services and rates to their owners? In the last ten years, fraud has caused 41% of failures. Turn your attentions to what matters, don't harm the vast majority of credit unions that have been operating the right way for years.

Don't take the easy road to governance by copying the banking industry—treat my credit union like a credit union and withdraw the risk-based capital ruling.

Alix Patterson