

## Regulatory Comments

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**From:** Sydney Wittner <no-reply@cuanswers.com>  
**Sent:** Wednesday, April 08, 2015 6:52 PM  
**To:** \_Regulatory Comments  
**Subject:** Risk-Based Capital Comment

To: Regulatory Comments  
From: Sydney Wittner  
Horizon Credit Union

04/08/2015

Dear Mr. Poliquin:

Congress intended for the NCUA to develop rules around credit union complexity that would take into account the diversity of credit unions. An arbitrary asset cut-off point is contrary to the mission Congress provided to the NCUA, which is to take in account the special nature of my members' relationship with my credit union.

I am a member of a credit union and I am opposed to the revised Risk-Based Capital regulation. 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. Don't take the easy road to governance by copying the banking industry-treat my credit union like a credit union. Thank you,

I am an employee and member of a credit union and I am opposed to the revised Risk-Based Capital regulation. I worry that the new rule will force us to ditch services that have been benefiting our members safely for years because you've deemed them to be too risky across the board without looking at the specifics. This is not effective regulation, it's undue punishment for our members and community. Thank you,

A handwritten signature in black ink, appearing to read 'Sydney Wittner', with a stylized, looped initial 'S' and a horizontal line extending to the right.

Sydney Wittner  
Horizon Credit Union