



APCO EMPLOYEES CREDIT UNION

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April 22, 2015

Gerald Poliquin, Secretary of the Board
National Credit Union Administration

I am writing on behalf of APCO Employees Credit Union located in Birmingham, Alabama. We serve employees and family members of Alabama Power Company, Southern Company Services and other select employee groups. We currently have 70,000+ members and have assets over \$2.4 Billion.

The NCUA's revised proposal to create a risk based capital standard is a step in the right direction, however, the proposed rule would still have significant negative capital consequences to Credit Unions and could place them at a competitive disadvantage to banks.

Since we are a "Member" based institution, I feel this will limit our ability to serve our members which is the reason for our existence. I think the RBC2 rule attempts to treat Credit Unions more restrictive than Banks and is not in the best interest for Credit Unions. Our Credit Union, along with many others have developed strategies that are proven to work and are safe and sound business practices, so we need and deserve the ability to continue doing this good work.

As a 34 year employee and member of APCO Employees Credit Union, thank you for the opportunity to express my/our views on this issue.

Sincerely,

Lori F. Hinesley
Member Services Manager
APCO Employees Credit Union