

From: [Greg Young](#)
To: [Regulatory Comments](#)
Subject: Prompt Corrective Action; Risk-Based Capital
Date: Wednesday, April 30, 2014 12:11:30 PM

Mr. Gerald Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428
Sent via E-mail to: regcomments@ncua.gov

Re: APCO Employees Credit Union comments on NCUA Proposed Regulation on Prompt Corrective Action; Risk-Based Capital

Dear Mr. Poliquin:

I am writing on behalf of APCO Employees Credit Union, We serve employees and families of Alabama Power Company, Southern Company and several other select groups. We have fifteen branch locations in Alabama with approximately 69,000 members and assets approaching 2.5 billion.

I am concerned the proposed rules will negatively impact Credit Unions and their Members.

The NCUA rule using a subjective measurement applied using examiner's discretion to require increases to capital could create confusion and inconsistency. Also when comparing the proposed capital requirements to capital requirements of banks, it appears that credit unions will be at a competitive disadvantage. We also take issue with all CUSO investments having a risk-weight of 250%. This seems excessive especially as compared to other risk ratings. We believe that it is in the best interest of NCUA and Credit Unions and the Members for these proposed rules to be revamped to more reasonable levels.

Thank you for the Opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Prompt Corrective Action - Risk-Based Capital.

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