



APCO EMPLOYEES CREDIT UNION

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MAY05'14 PM 1:40 BOARD

April 29, 2014

Gerard Poliquin, Secretary of the Board
National Credit Union Administration

I am proud to be both an employee and a member of APCO Employees Credit Union in Birmingham, Alabama. We serve over 69,000 members which includes Alabama Power Company, Southern Company and several other select employee groups. We have over \$2.4 billion in assets.

While I understand that a risk based capital requirement is necessary, I do not agree with this proposal. I feel that this new proposal is trying to force credit unions to be like a bank. We do not want to be a bank and charge more fees and pay less dividends to our loyal members. We are here to help our members.

The thing that bothers me most about the proposal is the examiner's discretion to determine an individual credit union as being "too risky" and requiring additional capital which again will hurt our members.

Thank you for allowing comments on this issue. Please consider making changes to improve this proposal.

Danna Horne

Danna Horne
Administrative Manager
APCO Employees Credit Union