

February 7, 2014

Robert E. Feldman, Executive Secretary ATTN: Comments Federal Deposit Insurance Corporation 550 17th Street NW Washington, DC 20429

The American Bank of Commerce, headquartered in Wolfforth, Texas has been in existence since 1962. We have \$688 million in assets, 14 branches and 170 employees. We have both metropolitan and rural locations with a diverse customer base.

For a community bank to survive, especially in these difficult time, they need to meet the credit needs of their customers. As such, having a group of employees that reflect the demographics of our community is essential to our survival.

Our compliance costs have greatly increased over the last few years, especially after the passage of the Dodd-Frank Act. We don't have the personnel, the training or the software to compile the various metrics suggested in the proposal. And, even if we did we do not believe there would be a change in our hiring or retention practices.

We don't have the ability to assess the diversity practices of our suppliers. If we were required to attempt to do so it would be just one more expensive regulatory burden that we would have to absorb. Please withdraw this proposal and come up with a simpler, more effective and less costly way for community banks to comply with this section of the Dodd-Frank Act.

Sincerely.

E. Powell Thompson President / CEO