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February 6, 2014

Monica Jackson Office of the Executive Secretary Bureau of Consumer Financial Protection 1700 G Street, NW Washington DC 20552 Docket No. CFPB 2013-0029

Robert deV.Frierson, Secretary Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue NW Washington DC 20551 Docket No. OP-1462

Legislative and Regulatory Activities Division Office of the Comptroller of the Currency Mail Stop 9W-11 400 7th Street, SW Washington DC 20219 Docket ID OCC-2013-0014 Robert E. Feldman, Executive Secretary Attention: Comments
Federal Deposit Insurance Corporation 550 17th Street, NW
Washington DC 20429

Gerard Poliquin Secretary of the Board National Credit Union Administration 1775 Duke Street Alexandria, Virginia 22314-3428

Elizabeth M. Murphy, Secretary Securities and Exchange Commission 100 F Street, NE Washington DC 20549-1090 File Number S7-08-13

Re: Proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Banks Regulated by the Agencies.

Dear Sir or Madam:

I am CEO and Chairman of Commercial State Bank. Commercial State Bank has been serving the community of El Campo, Texas, for over 90 years. El Campo is a rural community with a population of approximately 11 thousand and is located 67 miles southwest of Houston. The City has a Hispanic or Latino population of approximately 47%. The Bank has grown and now has four offices in Texas with assets of approximately \$275 million. Like El Campo, all of the offices are located in diverse communities with Hispanic populations of more than 38% each. The Palacios Office is in a rural community approximately 30 miles from El Campo while the Humble and Fulshear Offices are in suburban neighborhoods adjacent to Houston, which is truly a diverse city.

Our goal, as a community-centered Bank, is to meet the needs of our customers. With this in mind, our hiring practices are to find employees with values that support the community while mirroring the demographics of such.

Our commitment to our shareholders is to have a high performing bank that meets or exceeds all regulatory requirements. As such, these requirements for superior safety and soundness practices and strong compliance management processes are a top priority. The existing regulatory requirements

accompanied by the recent additional demands from the Dodd Frank Act have already created a burden on community banks. The additional layer of regulation necessary to be compliant with the proposed changes is not cost-effective. Therefore, I do not see how the proposed metrics would provide additional insight that would result in differences in our hiring practices.

We ask that you please withdraw this proposal and develop a simpler, less costly, and more cost-effective method for community banks to comply with this section of the Dodd Frank Act.

Thank you for your attention to this matter.

Respectively,

Harry J. Brooks Chairman and CEO