

From: Jay Mullins [mailto:jmullins@premierbankofthesouth.com]

Sent: Wednesday, August 22, 2012 11:23 AM

To: Comments

Cc: john.harrison@banking.alabama.gov; Packard, Richard L.; Dujenski, Thomas J.; 'nelson.cook@banking.alabama.gov'

Subject: RE: "FDIC" AND "RIN 3064-AD95" AND "FDIC" AND "RIN 3064-AD96"

RE: "FDIC" and "RIN 3064-AD95" and "FDIC" and "RIN 3064-AD96"

I request you exempt Community Banks, those below 1 billion dollars in assets, from this proposed rule. Congress did not mandate, nor did it intend, that Community Banks be regulated as the larger, more complex and systemically challenged, financial services corporations.

These corporations are "banks" in name only, as only a minugia of their revenue is derived from traditional banking services. These traditional banking services are the backbone of our entire national economy and are services which only Community Banks provide.

Congress did not mandate you include Community Banks in these regulations and you should not have taken it upon yourselves to force Community Banks into this "one size fits all" categorization.

As you often do, you can use Administrative Actions under your "Prompt and Corrective Action" authority to require banks to maintain a higher level of capital, so why should all Community Banks suffer because the largest financial services companies have over extended into non-banking areas?

Causing the economic backbone (local Community Banks) to suffer for the sins of those companies who only call themselves banks will only undermine the flow of needed credit to communities throughout the United States. These cities, small businesses and governments desperately need credit and other banking services in these difficult times.

If you do not exempt Community Banks from this regulation, you will cause a further decline in the number of Community Banks, as well as the effectiveness of the remaining Community Banks to provide for the needs of the people they serve. This will threaten the economic well-being of our Country, now and in the future.

Please exempt Community Banks from this regulation.

Sincerely,

John J. Mullins
Chairman, President
and Chief Executive Officer

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cc: Senator Richard Shelby by fax (202)224-3416
Representative Spencer Bachus by fax (202)225-2082
House Committee on Financial Services by fax (202)226-3390

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