

October 1, 2013

Gary A. Kuiper, Counsel  
Attn: Comments Room NYA-5046  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street NW  
Washington, DC 20429

RE: FFIEC 031, 041 and 101

Dear Mr. Kuiper:

The FFIEC has proposed revisions to regulatory capital components and has invited comments. Currently, FASB is reviewing a change in accounting standards that may increase the ALLL reserve that a bank would be required to hold. The Tier II capital calculation limits ALLL reserve component to 1.25%.

I would like to comment that in the event there is a structural increase in the ALLL reserve requirement, the cap of 1.25% should be raised proportionately in the calculation of capital.

Sincerely,



Stewart M Greenlee  
President & CEO