Dear Chairman Gruenberg,

FEDERAL DEPOSIT INSURANCE CORPORATION
12 CFR Part 324
RIN 3064-AE 63

As an employee of a community bank, I believe the proposed rule would help our bank and would be easy to implement and allow us to serve more consumers.
I believe that banks should maintain strong levels of high quality capital, I commend the banking agencies for their recent proposal to extend the existing Basel III transition provisions regarding the treatment of mortgage servicing assets, certain deferred tax assets, investments in the capital instruments of unconsolidated financial institutions, and minority interests. This proposal would effectively pause the phase-in of the regulatory capital deductions and risk weights regarding these items. I welcome the proposed regulatory pause. It sends a strong message that the prudential bank regulators are serious about providing regulatory relief to community banks who have been overwhelmed by new capital regulations that were originally designed for the largest too-big-to-fail megabanks that have the size and complexity to put our strong financial system at risk.

I wholeheartedly support the proposal to suspend the final transition deduction phase-in set to take effect on January 1, 2018. Additionally, I support efforts by the agencies to simplify the current regulatory capital framework for community banks in order to align regulatory capital standards with the tried and true straightforward lending models that have allowed community banks to drive economic growth in their local communities. The best way to accomplish this objective is to allow community banks to revert back to the Basel I capital framework that was in place prior to the advent of Basel III. If regulators are unwilling to do this, they should strongly consider significantly raising the current cap on MSAs, DTAs, or non-significant investments in other financial institutions so that community banks will not be penalized for holding these assets.

In many cases, community banks have invested in these financial assets for many years, and they have performed well for the banks without any problems. Restricting the ability of community banks to hold mortgage servicing assets results in them being retained by less regulated entities that may not provide the same level of care and diligence needed when maintaining a relationship with a borrower or other stakeholder. Equally important, mortgage servicing rights retained by community banks act as a natural hedge against rising interest rates and bring stability to earnings and asset valuations when interest rates rise rapidly.

Again, thank you for your attention to the current struggles faced by community banks as they navigate burdensome capital regulations meant for much larger banks that engage in more complex activities.

Sincerely,

Bonee Bonini