

Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules

Description:

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Comment ID: 108577

From: Jacy Bolton

Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules

Subject: Regs H & Y Regulatory Capital Proposals

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Comments:

Jacy Bolton

October 5, 2012

Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20th Street and Constitution Avenue, N.W. Washington, D.C. 20551

Office of the Comptroller of the Currency  
250 E Street, SW  
Mail Stop 2-3  
Washington, DC 20219

Robert E. Feldman  
Executive Secretary  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation,  
550 17th Street, N.W.  
Washington, D.C. 20429

Re: Basel III Capital Proposals

Ladies and Gentlemen:

Thank you for the opportunity to provide comment on the Basel III proposals<sup>[1]</sup> that were recently issued for public comment by the Federal Reserve Board, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation. [As an employee of a small community bank in West Virginia, I feel that Basel III would hurt community banks by forcing them to get out of real estate lending all together due to the standards required. Basel III was designed for larger financial institutions which operate on transaction volume and not customer relationships. Larger banks have the capital to mitigate the risks of losses. Community banks, with a declining economy, will not be able to thrive with the upgrades and additional capital balances required to meet the requirements of Basel III.

Community banks need to be there for the customers. This would only restrict people from getting a home loan or any home financing. The significant compliance costs and burdens that would be faced by some community banks could lead to some to shut the doors on valued customers.

Thank You,

Jacy Bolton

[1] The proposals are titled: Regulatory Capital Rules: Regulatory Capital, Implementation of BaselIII, Minimum Regulatory Capital Ratios, Capital Adequacy, and Transition Provisions; Regulatory Capital Rules: Standardized Approach for Risk-weighted Assets; Market Discipline and Disclosure Requirements; and Regulatory Capital Rules: Advanced Approaches Risk-based Capital Rules; Market Risk Capital Rule.