
From: Kent Pharaoh <hkpharaoh@msn.com>
Sent: Friday, September 28, 2012 10:05 PM
To: Comments
Cc: Donald Wells
Subject: Basel III FDIC RIN 3064-AD95, RIN 3064-AD96 and RIN 3064-D97

I have had the privilege of serving on the board of directors of a small community bank in eastern Oklahoma since 1971. I've seen the bank through good times as well as the tough economic times during my 41 year tenure. Our bank has always maintained a strong, positive influence in our community through the efforts of management and employee's selfless participation in community affairs as well as church and civic organizations. Our bank has long been known for it's solid management and sound fiscal policy. With the passage of the Dodd-Frank and new CFPB regulations, I am concerned that these new regulations will impact our employee's time for community involvement as there are only so many hours in a work week. Given that our bank is considered by most to be a "small" bank with assets under 100 million dollars, our staff is almost to the point of being overloaded with regulations and, in my opinion, it concerns me that we are at a point where we may loose our focus on why we even exist. It goes, without saying, that we are a service base operation and we exist to provide a service to our community and to the surrounding area. Because of the demands brought to bare by all existing rules and regulations that govern our operations and compliance PLUS when the new BASEL III becomes an issue for us to have to address, honestly, I don't know if we can continue with the focus that has made us the strong financial institution that we are today!

It is my desire that you use common sense when applying BASEL III to the financial industry. I respectfully request that you consider the small community banks and afford us protection from the implementation of the BASEL III regulations as written. Your thoughtful consideration is sincerely appreciated.

Respectfully,

Kent Pharaoh, Vice Chairman
AMERICAN EXCHANGE BANK
Henryetta, OK 74437

Cc: Donald Wells, President & CEO