



# FIRST SECURITY BANK



October 10, 2012

311 America Street  
P.O. Box 129, Storden, MN 56174  
Ph: 507-445-3417 Fax: 507-445-3259

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

RE: BASEL III

Mr. Feldman

I am writing to you and your office to request your consideration as to the effects of the BASEL III on small community banks. I urge you and your office to please make a clear distinction between the original focus of this Act to control and / or monitor the very large banking / investment banks organizations.

As part of the greater scheme of the banking world of the United States and the world for that matter, the small community banks were not the primary or even secondary contributors to the problems that occurred. I believe there is a distinct difference between banks and bankers to those who are investment banks and bankers. This difference is clear to us bankers on the main streets of the USA. Our efforts to work with our customers and our intentions to provide quality relationships with those customers is priority number one. Without those customers, we have no business. On the other hand the investment / mega banks have very little to no idea who even does business with them.

For this reason I feel that the grouping of all banks in one like manner and the requirements of those institutions promises to cause a vast array of problems for our local banks and more over our customers. For the banks that serve our local small communities, the continued burden of regulatory requirements and in some cases the changes to some standards of doing business that for many many years (without a problem) has already caused problems for our customers and communities. It seems that at some level, those who make and or enforce the laws of our industry fail to realize that for most community banks, we do NOT have departments for every task. In fact, most of our staff members are responsible for several duties in our banks.

I have worked in small community banks since 1961 and find that my customers are frustrated with the amount of paperwork necessary to complete a loan.

I respectfully request that you thoughtfully consider the outcome of this and all regulatory changes that you review. Please narrow the focus of the BASEL III to those large banks / investment banks as originally intended.

Sincerely

Ronald E. Torkelson  
Branch President  
First Security Bank  
Storden, MN

BENSON

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RENVILLE

DETROIT LAKES

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SLEEPY EYE

EVANSVILLE

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STORDEN

LAMBERTON