
From: Todd Lewis <toddl@fnb-bank.com>
Sent: Thursday, October 11, 2012 3:23 PM
To: Comments
Subject: Basel III FDIC RIN 3064-AD95, RIN 3064-AD96, and RIN 3064-D97

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^[1] 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.

Basel III was designed to apply to the largest, internationally active financial institutions. Applying Basel III to community banks will have a huge negative impact on Main Street America. I have heard it said that this could be the most dangerous regulation for community banks in over 50 years. This regulation will limit the lending capabilities of banks, which will also limit the amount of jobs the banks provide. In the worst case, it will cause a consolidation of banks, which will limit jobs even more. I am not able to see any positive impacts of this regulation, but I can see a lot of negative.

Please consider putting in a threshold that will accomplish your goals, and not destroy ours. I believe the senators had mentioned that the law was meant to be for \$50 billion institutions and above.

I really do appreciate your consideration.

*Todd Lewis, COO/VP
First National Bank
302 S. Main Street
P. O. Box 248
Cloverdale, IN 46120
Phone-(765) 795-5711 ext. 1151
[Email-toddl@fnb-bank.com](mailto:toddl@fnb-bank.com)*

^[1] The proposals are titled: *Regulatory Capital Rules: Regulatory Capital, Implementation of Basel III, 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*.