



October 12, 2012

The Honorable Ben S. Bernanke,  
Chairman  
The Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551

The Honorable Thomas J. Curry  
Comptroller  
Office of the Comptroller of the Currency  
250 E. Street, SW  
Washington, DC 20219

The Honorable Martin J. Gruenberg  
Acting Chairman  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Dear Chairman Bernanke, Comptroller Curry, and Acting Chairman Gruenberg:

My name is Paul M. Pecci and I am President of the Braintree Cooperative Bank, a mutually owned community bank located in Braintree, Massachusetts, with total assets of \$245 million. Our primary business is lending to our community, utilizing funds deposited from customers living in Braintree and contiguous towns. In fact, lending accounts for 59% of our balance sheet, with 76% of our loan portfolio in 1-4 family residential loans. An additional 61% of our investment portfolio consists of government sponsored mortgage backed securities – all of which are available for sale. Our emphasis has always been on lending first, while relying on the investment portfolio for liquidity and a temporary haven for deposits awaiting reinvestment into our community.

I write to convey my concerns and the concerns of my fellow officers, my board members, and my fellow community bankers with the proposed Basel III capital requirements, particularly with respect to the negative impact that such regulations would have on our individual bank and the entire community banking industry.

We are fully aware of the catastrophic affects on the national and international economies brought on, in part, by the failure of large banks and financial institutions to conduct business in a prudent and sound manner, and we support the efforts of the regulatory agencies to enhance the standards of the banking industry in this country. Unlike these “too big to fail” institutions, however, the Braintree Cooperative Bank (as well as the hundreds of smaller, community banks of Massachusetts), have operated our business in a safe and sound manner, having done so since 1889. We have continued to serve our communities; to provide a safe haven for individual wealth accumulation; to provide home financing for the average American; and to assist Main Street merchants and small business entrepreneurs in achieving their dreams – throughout depressions, recessions, and during times of prosperity.

As a small, local institution we know our customers – not because we have new laws that make us do this – but because that is how we have always done business. We know our customers; we know their parents, and their grandparents. In many instances we can stand out on the roof of our building and see our commercial borrower’s businesses or we can take a short walk or drive to visit them for lunch. Our customers are multigenerational and many have banked with us all of their lives because we are the community bank in Braintree. Our main office is located on Washington Street – not Wall Street. Our Mission Statement is based on community service – not corporate greed. Our customers know us – and we know them, not because of the law, but because this is community.

As a small community bank, we offer many of the same products and services that the large “too big to fail” institutions offer. We provide a myriad of savings, investments, and lending products. Our goal is to succeed, to thrive and to survive. This is where the similarities with the big banks stop. As a mutually owned institution, we have a commitment to our depositors to uphold the legacy that has been passed down for generations to provide prudent and sound banking to everyone in our community. As such, we have never been involved in the kinds of “high financing schemes” that brought on this current financial catastrophe. We have not preyed upon the weak nor have we misled our customers into unnecessary financial entanglements. We have provided several dozen re-finance plans over the past several years to enable as many families to stay in their homes after facing traumatic, and at times, catastrophic financial setbacks. As a result of prudent banking practices, we are proud to state that we have not had one foreclosure during this recent economic downturn.

We are concerned that the proposed Basel III rules will negatively impact our ability to serve our community.

Community banks such as ours have little or no access to capital markets. In order to survive we need to grow. In order to grow, we need additional capital (even with current capital requirements). Our primary source of capital growth is through retained earnings. Proposed capital calculation requirements (particularly seemingly excessive risk weighting) will adversely affect our capital position in a number of ways:

- Increased risk weighting of fixed-rate, long term residential mortgages will definitely limit our bank’s ability to offer first-time home buyer programs to those in our community who seek help in attaining the American dream of home ownership. We have been quite successful in providing this type of financing to young people in the community who would otherwise be shut out of buying a home. These first time buyers have proven to be excellent customers over the years.
- Mortgage lending is the mainstay of our business as a community bank. In an economic downturn (especially one driven by a volatile real estate market) risk weighting based on outdated loan-to-value ratios, particularly on loans that have maintained excellent credit and payment history, is unfair, if not punitive in nature.
- While we have always maintained a high standard of underwriting (as evidenced in our extremely low historic loss ratio), we have always complied with all of the underwriting standards needed to sell loans into the GSE secondary market. In most instances we look to retain the servicing of such loans, and in most cases we hold these loans for a short period of time before sale. In some instances, we have chosen to hold these loans for a longer period of time. Risk weighting these loans held on our books under the proposed calculations may hamper future lending to ‘less than perfect’ credits.

- Surplus funds (those not channeled into mortgage lending) are invested in a number of legally accepted investments such as government bonds, municipal bonds, corporate bonds, mortgage backed instruments, mutual funds and equities. Currently, market valuations are reflected on our books on a monthly basis through adjustments to comprehensive income in the Capital account. For Capital calculations, the FDIC does not require the comprehensive income adjustment – except in the instance of our equities portfolio. Proposed rules would force the recognition of market swings in comprehensive income and would create a potential for extreme volatility in our bank’s Capital.
- Our equities portfolio consists of blue chip and well known publicly traded stocks. We rely on dividends from these stocks to enhance our income and Capital. Proposed risk weighting (well in excess of 100%) of this type of investment would force us to liquidate this beneficial income source.

These are just a few of the instances in which this proposed regulations would have a negative and detrimental effect on the Braintree Cooperative Bank and community banking as a whole. We are concerned that the proposed standards are flawed in many ways when it comes to mutually owned, community banks. We feel that many of the risk weighted assessments are punitive in nature, intended to bridle the horse well after it has exited the barn; and that painting the well run, well regulated community banks with the same brush required for the mismanaged, “too big to fail” banks and the Wall Street crowd, is unfair and destructive to an essential form of American financing.

We look to you for your leadership and help in the survival of community banking in this country. We ask you to act on our behalf, and on behalf of the hard working members of our community, to reconsider the devastating effect of this proposed Basel III regulation, and to postpone enactment of this regulation until further studies and assessments can be made. I thank you for your consideration.

Sincerely,

Paul M. Pecci, President

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