

**From:** Scott D. Ball [mailto:sball@thebankofsalem.com]  
**Sent:** Wednesday, October 17, 2012 1:11 PM  
**To:** Comments  
**Subject:** Basel III FDIC RIN 3064-AD95, RIN 3064-AD96, and RIN 3064-D97

October 17, 2012

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 a community banker for 33 years in a rural community of 5,000 people, I ask for your help and understanding in putting a stop to additional, unnecessary regulations for community banks. We did not cause the financial crisis, we do not participate in risky, unregulated types of business, yet we are paying the price. As President of my bank for the past 12 years, I have seen the business of banking go from community & customer based to rules and regulations based. We are so overwhelmed with new rules, procedures, policies, memos, etc, we have had to triple our compliance staff. We are a highly capitalized bank, yet if Basel III becomes the law we will most likely have to increase our staff and spend additional time and money interpreting, implementing, and measuring our capital.

I don't think Congress is trying to put community banks out of business, but I am beginning to wonder. I used to be able to focus on our business and customers, but now spend most of my time trying to make sure we are obeying new rules and preparing for more. The community banking industry is already overwhelmed by government regulation, and Basel III will unnecessarily pile on additional regulatory burden. More regulations will ultimately lead to higher borrowing costs and diminished availability of both credit and bank services to consumers, small businesses and local governments. Please put a stop to this proposal.

Regards,

**Scott D. Ball, President**  
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<sup>[1]</sup> 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*.