
From: Todd Rowland <trrow@aldenst8.com>
Sent: Thursday, October 18, 2012 4:41 PM
To: Comments
Subject: "Basel III FDIC RIN 3064-AD95, RIN 3064-AD96, and RIN 3064-D97"

October 18, 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

Thank you for the opportunity to provide comment on the Basel III proposals that were recently approved by the Federal Reserve Board, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation.

My name is Todd Rowland, and I serve as the President/Compliance Officer of the Alden State Bank in Sterling, KS. The City of Sterling is located in central Kansas and has a population of 2,300. Sterling is located roughly 70 miles northwest of Wichita.

The Alden State Bank is a small, family owned community bank (\$20M) that will celebrate our 109th anniversary in January 2013. I am proud to tell you that I am the 5th generation of my family to have worked for our fine institution since inception in 1904. We owe our existence to great leadership and a loyal customer base. We are so thankful for the relationship and friendships that have been so much a part of our business over the years. I can honestly say that in our bank we know almost all our customers on a first name basis.

Our bank model has always been to provide personal service, including loans of all types and legal amounts, in service for our customers. The types of loans we make include: personal loans; consumer installments; consumer real estate, commercial & small business; agriculture and commercial/farm real estate loans.

Today, there are roughly 300 community banks in the State of Kansas, which is less than half the number of banks only 30 years ago. To the point - the Basel III proposals jeopardize our future existence and future service to our customers and community. I cannot stress this point enough.

Like many community banks our size, the burden of over regulation has taken its toll. Our bank has a full time staff of just 7 people, all of whom wear numerous hats in an effort to comply with bank regulations and law. If the Basel III proposals are allowed to become law it will effectively leave many community banks throughout the country with very few options for continued existence.

Independent Community Banks, like ours, are more than just commercial banks to our community. We are often times the only source of credit for small business, entrepreneur's, or just people who need someone to "take a chance" on them when they've fallen on hard times. Community Banks and their employees are often at the front of various community organizations and take leadership roles in their respective communities. Community Banks help provide generous donations for community fundraisers and are very strong supporters of education and schools. Community Bankers know the needs of their respective communities and work to address and solve those needs. In short Community Banks are an essential part of the very backbone of numerous communities located throughout this entire Country.

That is our culture. That is what we do. The Basel III proposals as they stand threaten to jeopardize the community bank model as we know it today, with very deep and potentially irreversible harm to thousands of small communities and the customers we serve.

The costs of these Basel III proposals more than exceed the proposed benefits, and I ask you on behalf of our bank to please consider dropping them all together.

Sincerely,

Todd Rowland
President/Compliance Officer
Alden State Bank
Sterling, KS