
From: Tonia Kueker <tkueker@bankdsb.com>
Sent: Friday, September 21, 2012 10:59 AM
To: Comments
Subject: Basel 111 FDIC RIN 3064-AD95, RIN 3064-AD96, RIN 3064-D97

Dear Sir:

I'm writing to protest having community banks become subject to the Basel III capital reforms. Fed Chairman Ben Bernanke has stated that these reforms were intended for only complex internationally active banks.

To impose complex risk-weighting rules on community banks on top of the Dodd-Frank onslaught is very likely to cause many to sell out to larger organizations. I thought Washington was trying to end "too-big-to-fail!"

If you must impose Basel III, please do it in correct fashion. As I understand it, if a bank has a 5% AFS investment security perfectly matched by a 3% liability, and interest rates triple, Basel III would require a capital write down for the asset and give no credit for the increased value of the liability. That wouldn't even pass muster in a high school accounting class!

Sincerely,

Dennis R. Brandt
President of Denver Savings Bank