

From: John Kingsbury [mailto:john@bankofdc.com]
Sent: Monday, September 24, 2012 2:43 PM
To: Comments
Subject: Basel III FDIC RIN 3064-AD95, RIN 3064-AD96, and RIN 3064-D97

FDIC Comments - While I have written previously about direct impacts of Basel III on our \$78MM Nebraska community bank founded in 1881, it seems that I should also mention additional obvious outcomes. When bank lending is restricted by over-regulation, time requirements and unreasonable risk weighting in addition to existing Impairment Testing and the resulting loss of profitability . . . lending will by the nature of business will move to different, more profitable models.

Initially, increased lending will move to the tax exempt, less regulated the Farm Credit System, credit unions and I predict "non-profit" un-regulated non-bank finance companies and more non-bank corporate financing.

That will be followed by every innovative, lucrative financial approach possible as the marketplace looks to by-pass onerous bank regulations to provide essential financial services by way of less regulated, more profitable models.

This is not a possibility, this is business. Might the cure be worse than the disease?
Sincerely, John

John Kingsbury

President
Bank of Dixon County

"Demand *real* change. Demand Congressional Term Limits."

Let's change Washington . . . for good!

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