



October 19, 2012

Ben S. Bernanke  
Chairman  
Federal Reserve Board  
20th St. and Constitution Ave, NW  
Washington, DC 20551

Martin J. Gruenberg  
Acting Chairman  
Federal Deposit Insurance Corp  
550 17th St., NW  
Washington, DC 20429

Thomas J. Curry  
Comptroller  
Comptroller of the Currency  
250 E St., SW  
Washington, DC 20

Dear Sirs:

Thank you for your consideration of feedback regarding the new capital standards proposed in the Basel III recommendations. Please accept the following comments submitted on behalf of the Denver Metro Chamber of Commerce and its affiliates: the Metro Denver Economic Development Corporation, the Colorado Competitive Council (C3) and the Denver Metro Small Business Development Center (SBDC), organizations that collectively represent more than 3,000 businesses, which provide more than 300,000 jobs in Colorado.

We write today to alert you to the potential damage that could result if the Basel III requirements are implemented. We are concerned that Basel III would reduce lending, increase costs of loans and limit the number of businesses and consumers who would qualify to obtain them. We are particularly concerned about access to capital for small businesses, and we are apprehensive about negative impacts to the commercial and residential real estate and construction markets.

Additionally, Basel III could disproportionately harm Colorado's small community banks, thereby reducing competition and options in financial markets. It is our understanding that Colorado banks would be required to increase their risk-based capital reserves by \$250-\$300 million, leading to \$2.5-\$3 billion in decreased lending in our state.

We respectfully request that you assess the negative impacts to businesses, consumers and the economy in general that would result from the proposed capital standards regulations outlined in Basel III. If you would like more information, please contact Sara Cassidy at 303-620-8054. Again, thank you for your consideration.

Best regards,

Kelly J. Brough  
President and CEO  
Denver Metro Chamber of Commerce

Tom Clark  
Chief Executive Officer  
Metro Denver Economic Development Corporation

Abram Sloss  
Director  
Denver Metro Small Business Development Center

Sara Cassidy  
Director  
Colorado Competitive Council

CC: Senator Mark Udall  
Senator Michael Bennet  
Don Childears, Colorado Bankers Association