

September 26, 2012

**Robert E. Feldman**, Executive Secretary

Attention: Comments/Legal ESS

Federal Deposit Insurance Corporation

550 17<sup>th</sup> Street N.W.

Washington, DC 20429

**Delivered via email [comments@FDIC.gov](mailto:comments@FDIC.gov)**

**Jennifer J. Johnson**, Secretary

Board of Governors of the Federal Reserve System

20<sup>th</sup> Street and Constitution Avenue N.W.

Washington, DC 20551

**Delivered via email [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)**

**Office of the Comptroller of the Currency**

250 E Street SE

Mail Stop 2-3

Washington, DC 20219

**Delivered via email [regs.comments@occ.treas.gov](mailto:regs.comments@occ.treas.gov)**

Re: Basel III Capital Proposals

OCC: Docket ID OCC-2012-0008

OCC: Docket ID OCC-2012-0009

FRB: Docket No. R-1430; RIN No. 7100-AD87

FRB: Docket No. R-1442; RIN No. 7100-AD87

FDIC: RIN 3064-AD95

FDIC: RIN 3064-AD96

Ladies and Gentlemen:

Never in the 40 year history of Alpine Bank, have we been rated anything other than satisfactory in Capital. We have formed community partnerships in each of the 37 locations we serve and have had continuous ownership and consistent upper management throughout our history. Alpine Bank currently maintains 100,000+ household accounts, mostly small businesses in the communities we serve. We would very much like to continue to operate this way, and believe our customers and communities feel the same way. We need them and they depend on us.

BASEL III raises major concerns about the long term viability of community banks and the availability of credit in areas we serve! 77% of small businesses in the US employ only 1 person. Is it really practical to assume that these types of businesses will bank at a “too big to fail” institution? I believe that answer to be a resounding NO!

For several years the near constant refrain from the public, public officials, media and others has been for banks to lend more to create more jobs. Basel III goes in the opposite direction: less credit, more expensive credit, fewer businesses (especially small businesses) due to credit restrictions and greater expense, and fewer jobs. Banks caught between popular demand for more credit, and regulators’ aversion to any risk is not what we need as a country. Society is not well served by risk-free banks that make no loans.

The nature, scope and complexity of the Basel III capital requirements appear to be a complete over-reaction. We believe this will have a big negative impact on individual businesses, the general economy and most importantly, the future of our community!

We request a complete withdrawal of the proposed regulation.

Sincerely,

Thomas H. Kenning

Regional President

Alpine Bank, Glenwood Springs, CO