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October 4, 2012

Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve  
System  
20th Street and Constitution Avenue, N.W.  
Washington, D.C. 20551

Office of the Comptroller of the Currency  
250 E Street, SW  
Mail Stop 2-3  
Washington, DC 20219

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

Ladies and Gentlemen:

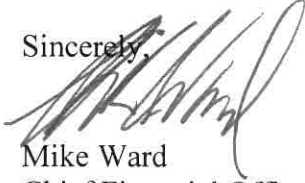
Thank you for the opportunity to provide comment on the Basel III proposals that were recently approved by the Federal Reserve Board, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation (collectively the “banking agencies”).

I work for a relatively small community bank (\$260 million in assets) located in central Florida. The Basel III proposals will not significantly change our business model as we are a well capitalized bank using time tested, conservative, principles. From my perspective, I see no benefit to the new capital proposals. However, I do see extraordinary recordkeeping and reporting problems related to the proposed changes in asset risk weighting. Attempting to value any specific asset is, at best, an educated guess. The only time these calculations are actually meaningful is when the assets being valued are in distress. From my experience, you never know the value of an asset until you attempt to sell it.

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Please reconsider these proposals and quantify capital adequacy in a more simplistic manner.  
Complicating the calculation does not improve the results.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Ward", written over the word "Sincerely,".

Mike Ward  
Chief Financial Officer  
Florida Traditions Bank