
From: Don Twaddle <dtwaddle@Washingtonstatebank.com>
Sent: Wednesday, October 10, 2012 9:53 AM
To: Comments
Subject: Base III RIN 3064-AD95, RIN 3064-AD96

Attn Robert E. Feldman, Exec Secretary
Atten: Comments/Legal ESS, FDIC

My name is Don Twaddle and I am the president of Washington State Bank. Our primary regulator is the FDIC. We are a \$50,000,000 bank located in Washington, Illinois. Our primary lending is for real estate and consumer loans.

I am very concerned about the Base III NPRs and the affect on our bank and the harm that it will cause our customers and serving our community.

I believe that all community banks should be exempted from the Base III capital requirements and the standardized approach for risk weighted assets.

It is always a concern to me when new regulation is applied to the roughly 7,000 banks that are not the problem with banking today. As I look back on all the regulation added in the last 30 years, I ask myself where would this bank be without all these regulation. The answer is approximately the **same place we are now**. The exception is would be providing our customers better service, have saved hundreds of thousands of dollars spent on compliance and regulation and have many hours a month that is wasted on compliance. Then there is the unintended consequence of new regulation that harms everyone, customers, employees and the banks capital.

The problems I see are passing on good loan opportunities, wasted time trying to comply with the regulation, wasted money complying, and less customer service. All this loss to the bank and community all for a needless regulation.

Thank you for taking my request under consideration. Please contact me at (309) 444-2265 or dtwaddle@washingtonstatebank.com with any comment or question.

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