



October 17, 2012

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

Thank you for the opportunity to provide comment on the Basel III proposals. As a community banker, I have a passion for serving the financial needs of our communities. Please do everything in your power to keep us positioned to fulfill our role. Placing Basel III requirements on us will do the opposite. Among the many things that concern me, here a just a few:

- It jeopardizes the viability of the community bank economic model
- It will cause our shareholders to consider other investment opportunities
- It is one more regulatory burden on earnings and human resources that would be better used in serving our customer base, especially small business
- It further un-levels a playing field that is already problematic for community banks

There are obviously a myriad of other issues I could expound upon. I know you understand the importance of strong community banks and trust you to be our advocate.

Sincerely,
Paul Cox

Paul Cox
SVP - Chief Credit Officer
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