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October 18, 2012

Mr. Robert E. Feldman, Executive Secretary
ATTN: Comments / Legal ESS
Federal Deposit Insurance Corporation
550 /17th Street NW
Washington, D.C> 20429

Re: Basel III Proposed Rules
FDIC Standardized Approach / RIN 3064-AD96

Dear Mr. Feldman:

We are a small bank of about 103 million dollars in a rural Georgia market with a lot of lower income customers. Since opening in 1976, Bank of Dooly has tried to serve all segments of our community, often helping folks who don't qualify elsewhere based on the credit standards of much larger regional and national banks. With today's compliance and regulatory burdens, however, it is increasingly challenging to assist such customers.

This is particularly applicable in the housing market. We've financed numerous homes for under \$50,000, helping our customers become homeowners rather than home renters. The regulatory paperwork burden has become so enormous over the past two years that we are already questioning whether to continue making these type loans. If we add to that the additional capital requirements of Basel III, our bank will have little incentive to remain in this market. These are in-house loans that don't qualify for the secondary market, loans that we keep on our books for up to 20 years, loans that provide home ownership opportunities for moderate and low income customers.

We have a simple banking operation with no complex investments. Perhaps there is some justification for Basel III for huge banking organizations. For a little country bank that focuses on a local market, however, it's just another stumbling block that requires time and resources to comply, and offers no tangible benefits to regulators, the bank, or our customers.

I would respectfully suggest that Basel III not be implemented for banks or at least exempt small community banks.

Sincerely,

Neil Joiner
President