



# ESCAMBIA COUNTY BANK

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August 30, 2012

Mr. Robert E. Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, D.C. 20429

Re: Comments/Legal ESS  
Proposed New Capital Rules

Dear Mr. Feldman:

Escambia County Bank is a typical community bank with \$85 million in assets and a tier one leverage capital ratio of 12% and a tier one risk-weighted capital ratio of 27%+. This institution by design does not have a complex balance sheet so that more resources can be better used to profitably serve the bank's customers.

We could send pages and pages of comment about pages and pages of proposed new rules, but the main point to us seems to be this: **Why is it necessary to add more complicated and restrictive capital rules to institutions such as Escambia County Bank, when our very existence is already threatened by the onerous new burdens of Dodd-Frank and the CFPB?**

Even though our current capital would only be marginally affected at the present, these proposed rules will hamper flexibility for customer service and growth in the future. These rules are entirely unnecessary for community banks with under \$500 million in assets.

Respectfully,

James R. Jones  
Chairman & President

Cc: Alabama State Banking Department  
Alabama Bankers Association  
American Bankers Association  
Senator Richard Shelby  
Representative Spencer Bachus  
House Committee on Financial Services