

October 10, 2012

FDIC

The Honorable Marty Gruenberg
 Acting Chairman
 Federal Deposit Insurance Corporation
 550 17th Street, NW
 Washington, DC 20429

OCT 26 2012

OFFICE OF THE CHAIRMAN

Dear Acting Chairman Gruenberg:

We are writing to express our concern with the proposed implementation of the Basel III capital requirements that were released for comment in June. We are concerned that regulations developed by the international community for the global banking system are being imposed on financial institutions of all sizes, including Oklahoma community banks.

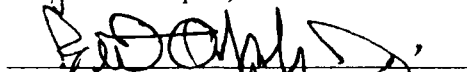
Community Banks were not participants in the underwriting of complicated derivatives. Rather, banks in Oklahoma continue to serve as the cornerstone of their community providing mortgage loans, investing in community bond issues, and developing personal relationships with their customers, helping them achieve their own economic success.

Much of the threat to community banks' competitiveness is a result of a dramatic tightening in regulatory enforcement. However, the changes to bank capital requirements being proposed by the implementation of Basel III are equally alarming. The change in definition of capital and the increase in the risk weights of many asset classes will squeeze banks even as our broader regulatory burdens are increasing.

We understand that capital is an important source of strength in our financial system. However the complexity of new global rules adds little value to the community institutions which are agencies regulate and monitor. As you review these proposed rules, we respectfully request you consider these unintended consequences and their effect on the viability of community banks across the country.

Sincerely,

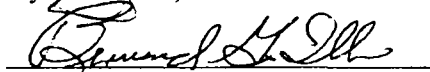

 J. David Davenport, Chairman


 Bert Olah, Jr. CEO

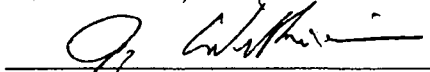

 Doug Fuller, President & COO

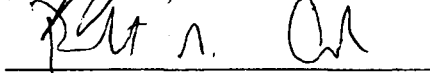

 Steve Thompson Executive VP


 Jay W. Morton, Director


 Bernard G. Ille, Director


 James L. Seikel, Director


 Jay Wilkinson, Director


 Robert N. Cooke, M.D., Director



Quail Creek Bank n.a.