



*Complete Financial Services*

October 24, 2012

Mr. Robert E. Feldman, Executive Secretary  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20419

Re: FDIC Basel III NPR (RIN 3064-AD95)

Dear Mr. Feldman:

I am President and CEO of Iberville Bank, a community bank based in Plaquemine, Louisiana, a bedroom community south of Baton Rouge. We operate 11 locations in 6 Parishes (Counties) throughout south-central Louisiana. Our primary markets are small to mid-size communities.

I have spent the bulk of my banking career (32 years) in community banks and know first-hand the tremendous burden we operate under trying to comply with the myriad of laws and regulations that Congress has passed in order to "protect" our industry and the consumers we serve.

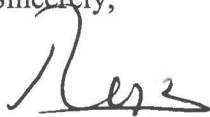
Every time I think that we have seen the last of the regulations Congress decides to "fix" another problem by passing another regulation.....Basel III would be a prime example. The endless barrage of laws and regulations coming from Washington are weighing our industry down to the point that we spend most of our time simply complying and not doing the important work of meeting the banking needs of the communities we serve.

From my view there are enough laws on the books and the appropriate risk constraints on community banks are best applied through the current examination process rather than another rule or regulation. I don't see the need to add additional capital burdens on community banks that, for the most part, already meet higher unofficial capital standards set by regulators. It would seem to me that implementation of Basel III will create additional regulatory oversight and examination review burdens for the OFI and FDIC leaving less time for the more important tasks of reviewing asset quality, liquidity and market risk. In other words, we already have the regulations in place to protect our bank and implementation of Basel III will make the examination process even more cumbersome and complicated.

We should not lose sight of the primary purpose of community banks – to provide credit to individuals and small businesses. These small businesses provide employment in the communities in which they operate. The concept of free enterprise is the basis of American economic system. I fear that new regulations such as Basel III will ultimately lead to consolidation in the banking industry thus reducing credit to the very businesses that keep our economy running.

I do not argue that the largest of banks in our country do need additional capital regulations. But please do not paint us with such a broad brush. Apply Basel III to banks over \$1 billion and allow the rest of us to continue under existing regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Smith", written in a cursive style.

Robert M. Smith  
President & CEO  
Iberville Bank