

That's My Bank!



September 13, 2012

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve
System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551

Office of the Comptroller of the Currency
250 E Street, SW
Mail Stop 2-3
Washington, DC 20219

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

Ladies and Gentlemen:

Thank you for the opportunity to provide comment on the Basel III proposals¹ that were recently issued for public comment by the Federal Reserve Board, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation.

I am deeply concerned with the affect the Basel III proposals will have on community banks like mine. Basel III was never intended to apply to small banks, which were not the cause of the current financial crisis. This proposal goes well beyond regulatory overreach. There is no doubt that these arbitrary and burdensome requirements will further suppress economic growth, and will likely cause many banks in small towns across the country to sell, consolidate, or be acquired. Options available to individuals and small businesses for obtaining loans and other critical banking services will be reduced - services which are critical to sustained economic expansion.

Main street banks will be particularly damaged by this proposal, at a time when businesses of all types are already struggling. How is the banking industry supposed to aid businesses when we are being strangled by the continual onslaught of new regulations, most of which provide no benefit to our customers whatsoever?

¹ The proposals are titled: *Regulatory Capital Rules: Regulatory Capital, Implementation of Basel III, Minimum Regulatory Capital Ratios, Capital Adequacy, and Transition Provisions; Regulatory Capital Rules: Standardized Approach for Risk-weighted Assets; Market Discipline and Disclosure Requirements; and Regulatory Capital Rules: Advanced Approaches Risk-based Capital Rules; Market Risk Capital Rule.*

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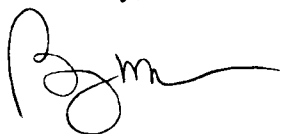
This proposal is another huge nail in the coffin of community banks. The vast majority of the banking industry has been able to withstand the severe economic conditions of the past few years, however the survival of many community banks is in serious jeopardy if this proposal is enacted as currently drafted.

These restrictive capital requirements should not be implemented in any form. Individual banks that warrant additional capital levels should be reviewed on a case-by-case basis, based upon specific conditions that exist at that individual bank.

Any attempt to apply this one-size-fits-all proposal to the banking industry will be disastrous for the economy and further erode the ability of banks to serve our customers and thereby improve our economy. Is this the intention of this proposal? I certainly hope not.

These unintended consequences may very well doom an already failing economy.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barry Hansen', with a long horizontal flourish extending to the right.

Barry Hansen
Chief Financial Officer
Four Corners Community Bank