



September 18, 2012

FIRST SECURITY BANK



Robert E. Feldman
Executive Secretary
Attention: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street N.W.
Washington, DC 20429

RE: BASEL III

Mr. Feldman

I am writing to you to request consideration of the effects of the BASEL III on the small community banks. As a branch manager of a small community bank trying to serve our customers / neighbors, it is hard to make sense of the original focus of this Act to control and / or monitor the very large banking / investment banks organizations which seems to have redirected it's intentions to banking as a whole including small community banks.

As part of the greater scheme of the banking world of the United States and the world for that matter, the small community banks were not the primary or even secondary contributors to the problems that occurred. I believe there is a distinct difference between banks and bankers to those who are investment banks and bankers. This difference is clear to us bankers on the main streets of the USA. Our effort to work with our customers and our intentions to provide quality relationships with those customers is priority number one. Without those customers, we have no business. On the other hand the investment / mega banks have very little to no idea who even does business with them.

For this reason I feel that the grouping of all banks in one like manner and the requirements of those institutions promises to cause a vast array of problems for our local banks and more over our customers. For the banks that server our local small communities, the continued burden of regulatory requirements and in some cases the changes to some standards of doing business that for many years (without a problem) has already caused problems for our customers and communities. It seems that at some level, those who make and or enforce the laws of our industry fail to realize that for most community banks, we do NOT have departments for every task. In fact, most of our staff members are responsible for several duties in our banks.

I am requesting that your thought fully consider the original intent of the BASEL III focus to those large banks / investment banks as originally intended. I firmly believe that the heart of the United States starts in the smaller communities of rural America which I am proud to serve and keep alive.

Sincerely

Michael L Bents
Branch Manager
First Security Bank
Lamberton, MN