



TRI-STATE BANK OF MEMPHIS

Enabling, Enriching & Enhancing Dreams

VIA E-MAIL

October 17, 2012

Mr. Robert E. Feldman
Executive Secretary
ATTN: comments /Legal ESS
FDIC

RE: FDIC
RIN 3064-AD95
Request to amend BASEL III

Dear Mr. Feldman:

I am writing to request your support to amend the BASEL III proposals to 1) eliminate the application of the proposals to community banks under \$1 billion, or 2) if a floor cannot be put in place, include changes that reduce BASEL III's impact on community banks.


The BASEL III standards would impose additional regulatory burdens on small banks like ours. Hardly a week goes by that our Bank does not produce a form, prepare a report, or file a report to a local, state, or federal agency.

Small banks did not behave recklessly in lending or other activities that contributed to the economic downturn. In fact, before the downturn we increased our residential lending in underserved areas.

Our Bank has raised capital with earnings over the years. The downturn has caused capital erosion. The new risk weights will cause further erosion. Eliminating or reducing the changes in them would be quite helpful.

Thank you for your thoughtful consideration and of our request!!

Sincerely,


Jesse H. Turner, Jr.
President and CEO

