

# FIRST NATIONAL BANK

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February 7, 2014

Monica Jackson  
Office of the Executive Secretary  
Bureau of Consumer Financial Protection  
1700 G Street, NW  
Washington, DC 20552  
Docket No. CFPB-2013-0029

Robert deV. Frierson, Secretary  
Board of Governors of the Federal Reserve  
System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551  
Docket No. OP-1462

Robert E. Feldman, Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Legislative and Regulatory Activities  
Division  
Office of the Comptroller of the Currency  
Mail Stop 9W-11  
400 7<sup>th</sup> Street, SW  
Washington, DC 20219  
Docket ID OCC-2013-0014

***RE:** Proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Banks Regulated by the Agencies*

Dear Sir or Madam:

The First National Bank of Gilmer, located in Gilmer, Texas has been in existence since April 1900. We have \$320,000,000.00 in assets, 10 branches and 107 employees.

Our branches are located in 4 Texas County's and we are a rural bank with a substantial number of Hispanic customers.

For a community bank to survive, especially in these difficult times, they need to meet the credit needs of their customers. As such, having a group of employees that reflect the demographics of our community is essential to our survival.

Our compliance costs have greatly increased over the last few years, especially after the passage of the Dodd-Frank Act. We don't have the personnel, the training or the software to compile the various metrics suggested in the proposal. And, even if we did we do not believe there would be a change in our hiring or retention practices.

We don't have the ability to assess the diversity practices of our suppliers. If we were required to attempt to do so it would be just one more expensive regulatory burden that we would have to absorb.

Please withdraw this proposal and come up with a simpler, more effective and less costly way for community bank to comply with this section of the Dodd-Frank Act.

Thank you for the opportunity to share our views,

Sincerely,

A handwritten signature in cursive script that reads "Kelly D. Stretcher". The signature is written in dark ink and is positioned above the typed name.

Kelly D. Stretcher  
President and CEO  
First National Bank of Gilmer