

From: Mark Bower

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To: Comments

Subject: Comment - Risk-Based Capital Standards - RIN 3064-AD10

By allowing large banks to decrease their capital ratios (on the premise that they really have less risk which has not always proven to be true) you are giving them a very large competitive advantage over smaller banks that do not have the resources to do the studies to prove their risk is just the same or less. This will further reduce the number of smaller banks, and accelerate the consolidation of financial assets into a few national banks. Our banking system is unique, and in my opinion superior, to other countries due to the lack of consolidated power of banking in just a few banks. Please do not do anything to lower capital standards.

Mark Bower

SVP and CFO

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