
From: Dave Pankonin <Dave@hsbonline.com>
Sent: Friday, October 05, 2012 5:33 PM
To: Comments
Subject: "Basel III FDIC RIN 3064-AD95, RIN 3064-AD96, and RIN 3064-D97"

FDIC:

This is a very simple appeal on the proposed Basel III rules. I am President of an \$82MM asset sized bank located in a town of 1,100 population in eastern Nebraska. My family has been involved with this bank since it was founded in 1915. With the proposed changes this bank will do less lending to our community, especially in house residential mortgages. Our community will be hurt, our bank will make less money to invest in capital or lending, so who wins? Our bank has a leverage capital ratio in excess of 12%. We like Tom Hoenig's ideas—keep it simple with strong leverage capital requirements. Plus our ALLL ratio is 1.80% and we think we are over reserved. Yet we get no credit over 1.25% to have this extra cushion for losses. PLEASE save community banks from these rules that will hurt banks and their customers. Thank you for reading this.

Sincerely,

David Pankonin – President

Home State Bank | 218 Main St., P.O. Box 429 | Louisville, NE 68037 | Phone: 402-234-2155 | Fax: 402-234-2458 |

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dave@hsbonline.com

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