
From: Linda Swan <tatagirl52@aol.com>
Sent: Saturday, October 06, 2012 2:40 PM
To: Comments
Subject: Basel III FDIC RIN 3064-AD95, RIN 3064-AD96 RIN 3064-D97

Gentlemen,

I'm writing to urge you not to impose the new Basel III requirements on community banks. The International Accord targeted only the largest, internationally active and complex banks, its sweeping scope will adversely impact US financial institutions and community banks in particular.

The complexity and restrictions imposed by the proposed capital buffer, risk weights and AOCI will greatly increase costs at a delicate time in banks' recovery. Moreover, future lending will undoubtedly be restricted. Higher risk weights for nonperforming loans duplicates the purpose of ALLL, a greater portion of which should be included in Tier 1 capital.

In short, the vast majority of community banks are not complicated/complex businesses and should not be treated on the same level as such.

Respectfully,

Linda M. Swan, Director
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