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## **GREENFIELD BANKING COMPANY**

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To Whom It May Concern:

I'm a long way from Wall Street, but small communities such as Greenfield, TN, have to face the kinds of regulations imposed on the monumental financial institutions in New York. Regulations due out in a matter of weeks would unnecessarily require my less than \$100 million dollar community bank to the same complex capital requirements as Wall Street megabanks. If you don't think that's going to make a tangible difference that will hurt a small town like Greenfield, think again.

We all know that the recent financial crisis took down some of the largest financial firms and contributed to the ongoing economic downturn. What you might not know is that in response, a body of regulators based in Basel, Switzerland, established new requirements on how much capital reserves these large institutions must hold. The idea is that the more capital they hold on their books, the more secure they will be when a crisis hits. In addition, these "Basel III" rules included complex standards on calculating the risks of a bank's assets.

It's not an unreasonable response to a crisis borne by Wall Street. Here's the catch. When U.S. financial regulators released their plans for implementing these standards, they proposed imposing them universally—even on the community banks that did not contribute to the crisis. I think this should be re-examined to determine why these rules are needed for small community banks like mine, one that didn't even take TARP money.

This plan is unreasonable, and dangerous for the financial institutions that serve smaller communities such as Greenfield, TN. Community banks maintain the banking industry's highest capital levels and operate a relationship-based model that recognizes the unique needs of their customers. Imposing complex capital regulations on us will limit the resources we can use to lend and reinvest in our communities, threatening our recovery, and perpetuating the lagging economy in our area.

If we want to prevent another Wall Street fiasco, we should not force community banks out of business and leave their customers in the hands of the megabanks. Without a thriving community banking industry, when it comes to our financial options, we won't be that far from Wall Street at all.

Punish the offenders, not the community banks who played by the rules, but are still having to follow the same rules. We don't have the time or resources available to us to dedicate to complying with more regulations that we should never have been subject to in the first place.

I appreciate your time and hope this regulation will be re-examined.

Sincerely,

Elena Miller, Compliance Officer  
Greenfield Banking Company  
Greenfield, TN