



October 18, 2012

Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: Basel III FDIC RIN 3064-AD95, RIN 3064-AD96 & RIN 3064-D97

Dear Sirs:

Both the proposed Basel III and the Standardized Approach Proposal for replacing the agencies' current regulatory capital rules for community banks are a threat to the viability of all non-complex small banks. The adoption of either approach will force an eventual end to the dual banking system that has been a hallmark of our nation's financial structure and a key to the ability of small business to access credit to support job creation.

These proposals, if implemented, will create an Orwellian system of capital requirements that will require constant adjustment on asset values that traditionally have very little fluctuation for banks of our size. These assets are not sold in the aftermarket and a reappraisal of current market values would create a fluctuating capital need that would be impossible for most of the small community banks to meet given their inherent inability to access capital markets due to their stock being both non-listed and closely held.

This plan is unreasonable, and dangerous for the financial institutions that serve smaller communities such as New London. 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 them will limit the resources they can use to lend and reinvest in their communities, threatening our recovery.

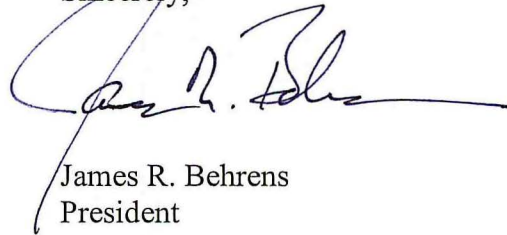
If we want to prevent another Wall Street fiasco, we should not force community banks out of business and leave their customers in the hands of megabanks. Without a thriving community banking industry, when it comes to our financial options, we won't be that far from Wall Street at all.

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MEMBER OF THE FEDERAL DEPOSIT INSURANCE CORPORATION

The RCSBank of New London, Missouri, endorses the position of the Missouri Bankers Association detailed in a letter to you dated October 15, 2012. We support the analysis of the purposed rules' negative effect on our industry and refer you to the thoughtful expose of the impending disaster for our industry and our country if these proposals are not substantially revised or withdrawn.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Behrens", written over a horizontal line.

James R. Behrens
President

JRB/cj

Cc: Senator Roy Blunt
Senator Claire McCaskill
Representative Sam Graves
Representative Blaine Luetkemeyer
Mr. Max Cook, MBA