
From: Comments
Sent: Thursday, September 20, 2012 11:59 AM
To: Comments
Subject: FW: Basel III FDIC RIN 3064-AD95, RIN 3064-AD96, and RIN 3064-D97

From: Bill Marin
Sent: Thursday, September 20, 2012 10:10 AM
To: 'comments@FDIC.gov'
Cc: Bill Marin; Strategic Planning Committee; T. Jefferson Fair
Subject: Basel III FDIC RIN 3064-AD95, RIN 3064-AD96, and RIN 3064-D97

Federal Regulators...

I would like to make a few comments regarding the proposed Basel III regs...to be more concise my comments will be in the form of short bullet points that get to the heart of my concerns:

- *More undue regulatory burdens on community banks
- *The unrealized gains/losses on AFS securities could/would cause too much volatility in capital ratios
- *Risk weightings in the mortgage loan sector are excessive and will cause a “pull back” by community banks especially in residential loan portfolios
- *Risk weightings will cause unnecessary reporting burdens

These four bullet points point out the very basic problems that will only further constrain and/or severely restrict community banks from being able to help the communities they were designed to help. Please consider this when making your final decisions...thanks...Bill

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