

From: [Julie Harris](#)
To: [Regs.Comments](#)
Subject: Basel III OCC Docket ID OCC-2012-0008, 0009, and 0010
Date: Thursday, October 18, 2012 11:21:00 AM

October 15, 2012

Ben Bernanke, Chairman
Federal Reserve Board of Governors

Martin J. Gruenberg, Acting Chairman
Federal Deposit Insurance Corporation

Thomas J. Curry, Comptroller
Office of the Comptroller of the Currency

Re: Basel III Docket No. 1442;
Basel III FDIC RIN 3064-AD95, RIN 3064-AD96, and RIN 3064-D97;
Basel III Docket ID OCC-2012-0008, 0009, and 0010

Dear Chairman Bernanke, Acting Chairman Gruenberg and Comptroller Curry,

Our bank has \$340 million in assets and 130 employees. We are laboring in an environment involving increased regulatory scrutiny in compliance exams and the new burdens being placed on us by the Dodd-Frank Act. Our compliance costs have increased significantly over the last 10 years.

It appears that this proposal will require all banks to collect new and often granular information in order to calculate risk weight assets with existing loans NOT being grandfathered. The complexity of the data requests most likely means that we will also have to install new software systems and/or look for third parties to provide them. **None of these requirements will allow us to help our customers in our community.** The compliance costs will pull money out of capital and earnings rather than help our borrowers.

The increasing cost of compliance for community banks is leading to more consolidation in our industry. Basel III, as proposed, will only accelerate this trend.

From our perspective, **community banks still serve a vital function in our economy.** It would be a shame if these new international capital requirements help lead to their demise.

Sincerely,

Julie Harris, PHR
Human Resource Specialist

Julie Harris, PHR
Human Resource Specialist
First Community Bank
416 N. Water St.
Corpus Christi, TX 78401
361-888-9310
Fax 361-888-3796
jharris@fcbot.com



This email transmission is intended only for the use of the individual or entity named above and may contain legally privileged or other confidential information. If the recipient of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is unauthorized and your receipt of such communication was unintended. If you have received this communication in error, please immediately notify us by telephone at (361) 888-9310 and destroy the communication.