

**From:** Joan Stephenson [mailto:JStephenson@febokc.com]  
**Sent:** Tuesday, September 25, 2012 1:44 PM  
**To:** Comments  
**Subject:** Basel III

**Re:** Comment on proposed Basel III regulatory capital rules/standards

*Regulatory Capital Rules: Regulatory Capital, Implementation of Basel III, Minimum Regulatory Capital Ratios, Capital Adequacy, and Transition Provisions; Regulatory Capital Rules: Standardized Approach for Risk-weighted Assets; Market Discipline and Disclosure Requirements; and Regulatory Capital Rules: Advanced Approaches Risk-based Capital Rules; Market Risk Capital Rule.*

Ladies and Gentlemen:

Thank you for the opportunity to provide comment on the Basel III proposals that were recently issued for public comment by the Federal Reserve Board, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation.

We are a small community bank in Oklahoma City already competing against the big banks also located here. Basel III will make it even tougher to compete.

We make real estate loans to consumers with balloon features to mitigate interest rate risk. We have been making balloon loans for many years with no adverse effect on either the bank or the customer. By doubling the capital requirement for this type of loan we may end up not making them which would have a negative effect on the consumer and the bank.

This proposal will have a disproportionately negative effect on community banks. The current capital standards for community banks provide a good balance between safety and soundness and the ability to serve the credit needs of our customers.

Thank you,

**Joan Stephenson**

Senior Vice President / Cashier



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