



October 9, 2012

Office of the Comptroller of the Currency 250 E Street, SW Mail Stop 2-3 Washington, DC 20219	Jennifer J. Johnson Secretary Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue, NW Washington, DC 20551	Robert E. Feldman Executive Secretary Attention: Comments/Legal ESS Federal Deposit Insurance Corporation 550 17th Street, NW Washington, DC 20429
---	---	---

Dear Bank Regulators:

On behalf of the 110 CEO's who are members of our organization, Colorado Concern, I write today to share our grave concern over the implementation of the capital standards included in Basel III. We believe that if implemented, as proposed, this measure will severely reduce lending and drive up the costs of loans for the limited number of businesses and consumers who would qualify to receive them.

Colorado Concern believes financial institutions must maintain a strong capital foundation for a stable financial system and economy. That said, we view the capital requirements in Basel III as excessive, and while cloaked in a veil of promoting bank safety, they will reduce the capital available to businesses, increase the cost of loans, and make it more difficult for individuals to obtain much-needed credit.

Additionally, as a result of Basel III, the banking industry will shrink, becoming more concentrated with fewer, bigger competitors. We strongly disagree with this result because competition in the market is critical.

It also is important to note our concern around the proposal's risk-weighting of various residential mortgage loans and other real estate lending. Such actions will negatively impact the housing market from affordable housing options to construction lending. At a time when our housing industry is struggling to rebound from the recession, this is very troubling and counterproductive.

Lastly, Basel III's risk-weighting of delinquent loans creates an incentive for banks to move rapidly to foreclose rather than attempt to cooperate with struggling consumers or businesses by allowing them to remain in their home or continue to operate their business. Such a disincentive to seek solutions does not help the situation that may have caused challenges; instead, it compounds it.

Colorado Concern respectfully requests that you halt the implementation of the proposed capital standards regulations outlined in Basel III. A more thoughtful and thorough understanding of the broader economic impact the proposal will have on businesses and consumers of all size, and our country's ability to rebound from the recession, is worthy of serious consideration.

Should you have questions regarding our position, please do not hesitate to contact me at (303) 860-1201.

Best regards,

A handwritten signature in black ink, appearing to read "Tamra J. Ward". The signature is fluid and cursive, with the first name being the most prominent.

Tamra J. Ward
President and CEO
Colorado Concern

cc:

United States Senator Mark Udall
United States Senator Michael Bennet
United States Representative Diana DeGette
United States Representative Jared Polis
United States Representative Scott Tipton
United States Representative Cory Gardner
United States Representative Doug Lamborn
United States Representative Michael Coffman
United States Representative Ed Perlmutter
Don Childears, Colorado Bankers Association