

---

**From:** John Jones <jjones@themiltonbank.com>  
**Sent:** Friday, October 19, 2012 5:13 PM  
**To:** Comments  
**Subject:** Basel III comments

The capital standards as proposed, if applied to community banks are unnecessarily complex and will cost our bank thousands of dollars to implement. The Basel III capital standards were designed to control the capital ratios of large European international operating banks.

Small community banks are not complex, individually, they are not systemically important and as a general rule, do not deal internationally. Community banks are however extremely important to middle class America, small town America, and should get credit for providing their customers with the financial services they need at reasonable costs while maintaining the credo that "return of your money is more important than the return on your money".

There is no logical reason other than elimination of community banks to impose this onerous regulation on banks like ours.

For years, community banks have struggled to remain the primary source of banking services for main street America. Regulations aimed to curb problems created by the mega-banks are being forced on to community banks as "best practice"

Small banks like ours don't not have the sophistication to grade each loan individually. If we are forced to abide by this rule, we will be forced to hire more employees to gather information that will not make our bank any safer. All that will be accomplished is to delay providing the service that our customers want.

There is in excess of 7000 pages of new regulations waiting for us community bankers to read digest and comply with. I think that's overkill.

In conclusion, the current proposal needs to be withdrawn and resubmitted recognizing that the risk profile of most community banks does not justify the expense and time necessary to implement Basel III as it stands.

### **John Jones**

President  
The Milton Banking Company  
Wellston, OH 45692  
740 384 2116

**CONFIDENTIALITY NOTICE:** The materials in this electronic mail transmission (including attachments) are private and confidential and are the property of the sender and The Milton Banking Company. The information contained in the material is intended only for the use of the named addressee(s). If you are not a named addressee, be advised that any unauthorized disclosure, copying, distribution or the taking of any action in reliance on the contents of this material is strictly prohibited. If you have received this electronic mail transmission in error, please immediately notify the sender by sending an e-mail message and thereafter, destroy it immediately."

**CONFIDENTIALITY NOTICE:** This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee, you should not disseminate, distribute or copy this email. Please notify the sender immediately by email if you have received this email by mistake and delete this email from your system. If you are not the intended recipient, you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.