Community Bankers
of Wisconsin

October 17, 2012

Jennifer J. Johnson, Secretary,
Board of Governors of the Federal Reserve System,
20th Street and Constitution Avenue, N.W.,
Washington, D.C. 20551
Docket No. R–1430; RIN No. 7100–AD87
Docket No. R–1442; RIN No. 7100–AD87

Office of the Comptroller of the Currency
250 E Street, S.W., Mail Stop 2-3
Washington, DC 20219
Docket ID OCC-2012-0008
Docket ID OCC-2012-0009

Robert E. Feldman, Executive Secretary
Attention: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429
FDIC RIN 3064–AD95
FDIC RIN 3064–AD96

RE: Regulatory Capital Rules: Regulatory Capital, Implementation of Basel III, Minimum Regulatory Capital Ratios, Capital Adequacy, Transition Provisions, and Prompt Corrective Action

Regulatory Capital Rules: Standardized Approach for Risk-Weighted Assets; Market Discipline and Disclosure Requirements

Dear Sir or Madam:

I am writing on behalf of the Community Bankers of Wisconsin ("CBW"), a statewide trade association representing 200 community banks across Wisconsin. CBW appreciates the opportunity to comment on the three notices of proposed rulemaking on minimum regulatory capital and the standardized approach for risk-weighted assets that were issued for public comment by the Board of Governors of the Federal Reserve System, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation on June 7, 2012

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("Proposed Rules").[1] The Proposed Rules are intended to implement global capital standards developed by the Basel Committee on Banking Supervision in the aftermath of the financial crisis of 2008-2009 ("Basel III").

As described below, while we understand and appreciate the need to revise and update existing regulatory capital rules, the Proposed Rules are overly complex and burdensome and will curtail lending and force further industry consolidation. This in turn will have a devastating impact on communities across Wisconsin. Accordingly we respectively request that you consider the following comments to the Proposed Rules:

<u>If the Proposed Rules are not withdrawn, they should exempt community banks</u>

While the CBW is supportive of efforts to ensure that community banks continue to maintain adequate capital levels, the Proposed Rules will impose a significant and costly compliance burden on an industry which does not pose a systemic risk to the U.S. financial system and which did not engage in the risky behaviors and activities that contributed to the financial crisis. Basel III was intended for large, sophisticated financial institutions that are systemically important in the global financial system. We respectfully submit that imposing a complex and uniform global capital scheme on the community banking industry without regard to the size, complexity and risk profile of individual banks or the industry as a whole is unnecessary and unwarranted.

The U.S. banking system is unique in the global financial system. No other country in the world has the size and scope of locally-owned community banks that serve such a vital role in local economies and communities. While increasing merger activity in the U.S. over the last 25 years has lead to an increase in market share by a several large and geographically diverse financial institutions, community banks continue to play an active and important role in the U.S. financial system. There are nearly 7,000 community banks in the U.S., of which approximately 30 percent have assets of $100 million or less. The evolution of the community banking system reflects a long-standing concern in the U.S. about the consolidation of the industry and the influence that a few large institutions could have on the stability of the banking system.

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[1] The Proposed Rules are titled: *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.*

In contrast, in many countries around the world only a handful of extremely large, highly-diversified financial banking organizations dominate the financial services landscape. With tens or even hundreds of billions of dollars in assets, these organizations are involved in all aspects of the local or regional economies and are engaged in a wide range of activities that have a significant impact on the global financial system as a whole.

We believe that treating a $100 million local community bank the same as a $100 billion national or global financial services organization for purposes of standardized capital standards makes little sense and is not consistent with the underlying objectives of the Basel III capital agreements. Quite simply, community banks operate under a very different business model than these complex organizations, and they pose absolutely no systemic risk to the national or global financial system. Community banks generally do not invest in securitizations, do not utilize complex derivatives, and do not engage in substantial off-balance sheet transactions. Capital standards should be based on the individual risk profile and characteristics of banks, such as the asset size, scope of operations and nature of activities, rather than lumping all banks under one set of standardized rules.

Ultimately, the CBW believes that the "one size fits all" approach in the Proposed Rules will have serious, unintended consequences on the entire community banking industry and the overall economy. Community banks play a critical role in the U.S. financial system – especially in key segments of the economy, such as small business and agricultural lending and retail deposit services. For example, in Wisconsin, community banks serve as an important source of credit for consumers and small businesses in underserved rural and agricultural communities.

The Proposed Rules will result in a significant and costly compliance burden on the industry and further tax the limited resources of community banks. The Proposed Rules also will cause community banks to curtail lending, especially for loan products that have a higher risk weighting under the Proposed Rules. In the end, we believe that the Proposed Rules will stifle growth and will accelerate industry consolidation - all at a time when a strong community banking industry is important to the recovery of the U.S. economy.

Lawmakers, regulators and the public agree that community banks did not contribute to the global financial crisis. Furthermore, the community banking industry as a whole has, and continues to maintain appropriate levels of capital. In Wisconsin, based on most recent available data from the FDIC, the average total risk-based capital ratio for community banks is 17.7%. While the CBW and its members understand and appreciate the need to revise existing regulations to better respond to the risk of future financial downturns, we do not believe that the approach taken in the Proposed Rules is reasonable or prudent based on the risk profile and business model of community banks.

Accordingly, we respectively request that community banks be exempt from the Proposed Rules and capital adequacy should continue to be measured by the existing methodology. If the agencies do not exclude community banks from the Proposed Rules, we urge the agencies to take into consideration the specific concerns and recommended changes noted below.

Inclusion of Accumulated Other Comprehensive Income will create balance sheet volatility and should not be included in Common Equity Tier 1 Capital

The inclusion of unrealized gains and loses in available-for-sale securities held in Common Equity Tier 1 Capital will create a significant amount of uncertainty and volatility in regulatory capital levels for banks. Accumulated other comprehensive income largely results from unrealized gains and losses in available-for-sale securities held in a bank's investment portfolio. Unrealized gains and losses in available-for-sale securities occur primarily as a result of the movement in interest rates rather than as a result of credit risk. When there is a change in the value of an available-for-sale security, which can occur daily, that change must immediately be accounted for in regulatory capital, even though it has no bearing or relationship to credit risk and the gain or loss may never be realized.

The other problem is that bank investment portfolios already have the impact of the historically low interest rate environment embedded in them. When interest rates rise, as they inevitably will, banks will be faced with potentially significant unrealized losses in their securities portfolios, which will degrade regulatory capital levels. Further, the "mark to market" requirement will require banks to hold more capital to compensate for fluctuations in interest rates, which will curtail lending and growth. While large financial institutions are able to efficiently hedge interest rate risk in their securities portfolios, community banks have fewer options to hedge this risk.

Faced with the risk and volatility of incorporating marketing rate swings into Common Equity Tier 1 Capital, banks may simply elect to hold more of their investment portfolio in "Held to Maturity" securities or hold more capital to compensate for swings in interest rates, which will inhibit earnings and liquidity.

For these reasons, we believe that adjusting regulatory capital based on the movement of market rates for available-for-sale securities creates uncertainty and instability in regulatory capital levels during periods of rising and falling interest rates, and will have a significant negative impact on the industry as a whole. Bank balance sheets should be managed with the overall goal of being neutral to interest rate changes. This aspect of the Proposed Rules would potentially add significant volatility to bank balance sheets.

Trust preferred securities should continue to be permanently grandfathered for intermediate bank holding companies

Under the Collins Amendment to the Dodd-Frank Wall Street Reform and Consumer Protection Act, intermediate bank holding companies with less than $15 billion in assets had any outstanding qualifying trust preferred securities ("TruPS") permanently grandfathered as regulatory capital. We believe that the treatment of TruPS in the Proposed Rules; namely, the phase-out of TruPS over a 10-year period, is inconsistent with the clear legislative intent expressed in the Dodd-Frank Act. The Board of Governors of the Federal Reserve System also has long recognized that the capital rules should be applied differently to institutions based on asset size.

The phase-out of TruPS would remove a vital source of capital and would have a material impact on the capital ratios of intermediate bank holding companies. Furthermore, many intermediate bank holding companies have far less access to the capital markets than larger institutions; this was one of the principal reasons for including a carve-out for intermediate bank holding companies in the Collins Amendment to the Dodd-Frank Act. For these reasons, we believe that the exemption set forth in the Dodd-Frank Act should be respected.

Higher capital risk weightings should be reconsidered

Under the Proposed Rules, the agencies would impose significantly higher capital risk weights for several categories of real estate-secured loans, even though there does not appear to be any empirical data substantiating or supporting the proposed risk weightings. This is perhaps one of the most problematic and concerning aspects of the Proposed Rules for the community banking industry. It is highly reactionary to the recent financial crisis and does not reflect a long-term approach that is in the best industry of the industry or the national economy.

The proposed increase in risk weightings for residential mortgage loans and lines of credit, and the proposed 150% risk weightings for "high volatility commercial real estate exposures," fails to account for a bank's experience and expertise in this type of lending, the adequacy of its policies and procedures and the level of concentration. We believe that issues with respect to residential, development and construction lending should be addressed at the risk management level rather than though an arbitrary and highly punitive risk weighting methodology.

Community banks serve as a vital source of credit for consumers and small businesses, and many of the precise types of loans which would have higher risk ratings under the Proposed Rules, such as balloon mortgage loans and second-lien loans, are important financing alternatives in underserved and rural communities. Based on the experience of our members, there is little or no evidence that many of these type of loans present a higher degree of risk. Furthermore, new appraisal rules and more rigorous underwriting standards in recent years have addressed any perceived risk in this segment of the industry.

The arbitrary and substantial increases in risk weights will discourage community banks from making certain residential and commercial real estate loans and increase the cost of credit to both consumer and business borrowers. In fact, our members have already started to revise their loan policies to curtail lending as a direct result of the Proposed Rules. From a public policy perspective, we do not believe that it is in the best interest of the industry or the national economy to create disincentives for banks to fund and originate properly underwritten real estate loans that the vast majority of banks have done prudently for decades. Accordingly, we believe that the existing risk weighting framework should be preserved.

We are also troubled by the fact that the Proposed Rules do not recognize private mortgage insurance ("PMI") when determining an LTV for a particular loan, even though PMI reduces the risk of loss for such loans. The reality is that borrowers often have difficult in coming up with a 10% down payment, and PMI is an important tool in ensuring that credit is available to consumers. PMI continues to serve an important role in mitigating risk in residential mortgage portfolios, and if the bank can demonstrate that the provider is financially-sound, we believe that PMI should be considered when determining a loan's LTV ratio for capital risk weighting purposes.

In addition to curtailing lending, the Proposed Rules will create an extraordinarily expensive and time-consuming process whereby banks will have to go back and review their entire loan portfolio and potentially reassign new risk weightings to many loans and lines of credit. Banks underwrote and originated their existing credit portfolios based on existing capital risk weightings rules in effect at the time of origination. Essentially, this proposal will change the rules of the game midstream. At a minimum, if the agencies decline to modify or restructure the risk weighting framework in the Proposed Rules, we believe that the risk weightings that are currently in effect should apply to existing loans and lines of credit, and these portfolios should be permanently grandfathered from the new risk weightings in the Proposed Rules.

<u>The Capital Conservation Buffer should be reconsidered</u>

The additional 2.5% capital conservation buffer in the Proposed Rules, layered on top of already increased capital requirements, essentially redefines what it means to be "well-capitalized." This buffer will lead to unreasonably high levels of capital, which will substantially reduce lending and adversely affect the profitability and viability of many banks' business operations.

The allowance for loan and lease losses already serves as a buffer against potential loan losses. In addition, the existing regulatory framework already contains appropriate restrictions on the payment of dividends, and institutions that are not in a safe and sound condition are subject to supervisory restrictions on forms of executive compensation through regulatory enforcement actions or through the "golden parachute" payment restrictions under FDIC regulations. Further limiting the ability of banks to pay dividends and distributions to investors will hurt their ability to attract investors and raise necessary capital. The restrictions on executive compensation also will hurt the ability of banks and the entire banking industry to retain and recruit key executives.

We believe that the capital conservation buffer is redundant and unnecessary, and that restrictions on capital distributions and the payment of executive compensation should be handled under the existing regulatory framework on a case-by-case basis.

* * * * *

As set forth in the detailed comments above, CBW believes that the Proposed Rules should be withdrawn or modified to include an exemption for community banks. The Basel III capital agreements do not reflect the diverse banking system in the U.S. and the unique nature and scope of the community banking industry. Calculations of assets and capital should be adjusted according to an institution's size, complexity and risk profile rather than a standardized "one size fits all" approach, which is inflexible, penalizes community banks that were not the cause of the financial crisis, and creates additional regulatory burdens for an industry that is being overwhelmed by new and costly regulations.

At a minimum, we believe that there is a need for further study on the potential impact that the Proposed Rules will have on the industry and the economy in general, and the Proposed Rules should be substantially revised to incorporate our concerns and the concerns of the industry.

We have enclosed 110 petitions signed by community banks and other industry representatives urging the agencies to exempt community banks from the Proposed Rules.

CBW appreciates the opportunity to share our thoughts and concerns about the Proposed Rules and ask that you consider our comments in developing the final rules. Thank you for your consideration.

Sincerely,

Daryll J. Lund

Daryll J. Lund
CBW President & CEO

Community Bankers
of Wisconsin

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III September 12, 2012

We, the undersigned community bank chief executive officers, presidents, directors and employees all of whose banks are members of the Community Bankers of Wisconsin trade association, hereby submit this petition to urge the Federal Reserve Board, Office of the Comptroller of the Currency, and Federal Deposit Insurance Corp. (the "banking regulators") to exempt community banks from the proposed implementation of Basel III in the United States and to allow community banks to continue operating under Basel I capital regulations.

We believe the following:

- Basel III was originally conceived to apply only to the largest, systemically important and internationally active banks.
- Community banks did not engage in the reckless behavior that contributed to the recent financial crisis and subsequent economic downturn.
- Imposing complex and excessive capital standards will threaten the nation's economic recovery and limit lending, investment, and credit availability in Main Street communities.
- Basel III will force community banks to hire new compliance staff, compute complex risk weights for residential mortgages, and limit their loan offerings to meet the requirements of arbitrary risk-weighted buckets—which will result in disastrous and unintended consequences to the communities they serve.
- Community banks have lower risks because they operate under a relationship-based model that cannot be measured solely by imposing analytical capital standards.
- Including accumulated other comprehensive income (AOCI) as regulatory capital will dramatically increase regulatory capital volatility and require community banks to hold capital substantially in excess of regulatory requirements.
- The new rules will significantly alter the capital treatment of mortgage-servicing assets, deferred tax assets, and trust-preferred securities, requiring community banks to make major changes to their financial statements.
- Community and mutual savings banks do not have access to the capital markets, and subjecting them to capital measurement systems that causes capital ratios to fluctuate dramatically based upon the Fed's interest rate policy is an extreme disservice to them.
- Subchapter S corporation banks will be significantly affected by dividend restrictions imposed by the proposed capital buffer.

Community banks wish to remain on Basel I, which more accurately aligns their regulatory capital with the type of assets they hold and the relationship model they follow. Therefore, we urge the banking regulators to exempt community banks from the Basel III proposal and allow them to continue to operate their banks under the Basel I capital framework, which has served their relationship-based banking models and this nation so well for over a generation.

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Ph 608.833.4229 • Fax 608.833.8114 • www.communitybankers.org

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Craig A. Stuedemann

Signature: [signature]

Bank Affiliation: AbbyBank

City: Weston, WI.

Print Name: SCOTT KRIEGER

Signature: [signature]

Bank Affiliation: BANKERS' BANK

City: EAU CLAIRE, WI

Print Name: Travis Holt

Signature: [signature]

Bank Affiliation: Citizens State Bank of Loyal

City: Loyal WI

Print Name: Michael E. Klassy

Signature: [signature]

Bank Affiliation: BANK OF MONTICELLO

City: Monticello, WI

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
Petition, continued…

Sign our Petition:

Name: Jerry O'Connor
Bank Affiliation: The National Bank of Waupun (NBW)
City: Waupun, WI.

Name: David Hopp
Bank Affiliation: NBW
City: Waupun, WI.

Name: Sharon Bos
Bank Affiliation: NBW
City: Waupun, WI

Name: Sandra Arndt
Bank Affiliation: NBW
City: Waupun

Name: Kevin Haan
Bank Affiliation: NBW
City: Waupun

Name: Tina Ritzer
Bank Affiliation: NBW
City: Waupun, WI

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Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: JOE PEIKERT

Signature: [signature]

Bank Affiliation: WOLF RIVER COMMUNITY BANK

City: HORTONVILLE

Print Name: Craig O'Leary

Signature: [signature]

Bank Affiliation: Farmers & Merchants Bank of Orfordville

City: Orfordville, WI

Print Name: Warren Laube

Signature: [signature]

Bank Affiliation: Greenwoods State Bank

City: Lake Mills, WI

Print Name: Terry KATSMA

Signature: [signature]

Bank Affiliation: Oostburg STATE BANK

City: Oostburg WI 53070

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Rita Tubbs

Signature: Rita Tubbs

Bank Affiliation: Bank of Sun Prairie

City: Sun Prairie, WI

Print Name: Robert Shetter

Signature: Robert Shetter

Bank Affiliation: Bankers' Bank

City: Madison WI

Print Name: Tim Tidd

Signature: [illegible]

Bank Affiliation: Bank of Luxemburg

City: Luxemburg WI

Print Name: David Luebbers

Signature: David Luebbers

Bank Affiliation: Bank of Luxemburg

City: Luxemburg WI.

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Jim Lamack
Signature: Jans Lamack
Bank Affiliation: Union State Bank
City: Kewaunee

Print Name: MARTIN REINHART
Signature:
Bank Affiliation: HERITAGE BANK
City: SPENCER

Print Name: Karla Roeker
Signature: Karla Roeker
Bank Affiliation: Community Bank CBD
City: Delavan, WI 53115

Print Name: Gary De Master
Signature: Gary DeMaster
Bank Affiliation: Oostburg State Bank
City: Oostburg

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Mary Jo Ceniti

Signature: Mary Jo Ceniti

Bank Affiliation: Farmers Savings Bank

City: Mineral Point, Wi 53565

Print Name: Tim Ryan

Signature: Tim Ryan

Bank Affiliation: Monona State Bank

City: Monona WI

Print Name: Scott Mahlum

Signature: [illegible]

Bank Affiliation: Alliance Bank

City: Mondovi, WI

Print Name: Donna Johnson

Signature: Donna Johnson

Bank Affiliation: Pioneer Bank

City: Auburndale, WI 54412

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III

September 12, 2012

Sign our Petition:

Print Name: Tom Tubbs

Signature: Tom Tubbs

Bank Affiliation: Bank of Sun Prairie

City: Sun Prairie - WI 53590

Print Name: Jim Tubbs

Signature: [illegible]

Bank Affiliation: State Bank of Cross Plains

City: Cross Plains

Print Name: Tonya Tubbs

Signature: [illegible]

Bank Affiliation: State Bank of Cross Plains

City: Cross Plains

Print Name: Tom Oehler

Signature: [illegible]

Bank Affiliation: Peoples Bank

City: Elkhorn

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Steve Dehnert

Signature:

Bank Affiliation: Badger Bank

City: Fort Atkinson

Print Name: STEVEN C BELL

Signature: Steven C Bell

Bank Affiliation: COMMUNITY STATE BANK

City: UNION GROVE, WI

Print Name: Anthony E Helmueller

Signature: A. E. Helmueller.

Bank Affiliation: AllIANCE

City: MONDOVI.

Print Name: Jennifer Piotte

Signature: Jennifer A Piotte

Bank Affiliation: State Bank of Cross Plains

City: Waunakee, WI

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: JON Bernander

Signature: [signature]

Bank Affiliation: Bank of Wisconsin Dells

City: Wisconsin Dells

Print Name: Douglas A. MARTIN

Signature: [signature]

Bank Affiliation: LIVINGSTON STATE BANK

City: LIVINGSTON, WI 53825

Print Name: Brad Schroeder

Signature: [signature]

Bank Affiliation: DMB Community Bank

City: Deforest

Print Name: Stephen J. Eager

Signature: [signature]

Bank Affiliation: Union Bank & Trust company

City: Evansville

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: MATTHEW C HARMS
Signature:
Bank Affiliation: CLEVELAND STATE BANK
City: CLEVELAND

Print Name: Mike Jones
Signature:
Bank Affiliation: Bank of Prairie du Sac
City: Prairie du Sac

Print Name: Randall Bobholz
Signature:
Bank Affiliation: Farmer + Merchants Union Bank
City: Columbus

Print Name: Kevin Piette
Signature:
Bank Affiliation: State Bank of Cross Plains
City: Cross Plains, WI

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Mary Jill Judd
Signature: Mary Jill Judd
Bank Affiliation: Farmers & Merchant Bank
City: Rudolph, WI

Print Name: Frank Servais
Signature: [illegible]
Bank Affiliation: Alliance Bank
City: Mondovi

Print Name: PAUL J SCHAUER
Signature: [illegible]
Bank Affiliation: BANK OF WISCONSIN DELLS
City: WISCONSIN DELLS, WI

Print Name: Cindy Huhn
Signature: Cindy Huhn
Bank Affiliation: Cleveland State Bank
City: Cleveland, WI

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Stan Needle

Signature:

Bank Affiliation: Choice Bank

City: Oshkosh WI

Print Name: DAVE BORCHARDT

Signature:

Bank Affiliation: COMMERCE STATE BANK

City: WEST BEND WI

Print Name: Guy Nelson

Signature:

Bank Affiliation: F&M Bank

City: Kendall

Print Name: James R Judd

Signature:

Bank Affiliation: Farmers & Merchants Bank

City: Rudolph

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Jeff Niesen

Signature: [signature]

Bank Affiliation: Bankers' Bank

City: Madison WI

Print Name: Fay Schmidt

Signature: Fay Schmidt

Bank Affiliation: Bank North

City: Wausaukee WI

Print Name: Scott M. Cattanach

Signature: Scott M Catta

Bank Affiliation: Peoples State Bank

City: Wausau, WI 54401

Print Name: Jeffrey W. Kleiman

Signature: Jeffrey W. Kleiman

Bank Affiliation: Union State Bank

City: Kewaunee, WI 54216

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Bill McDonald

Signature: Bill McDonald

Bank Affiliation: Greenwoods State Bank

City: Lake Mills

Print Name: Rick Busch

Signature: [illegible]

Bank Affiliation: Royal Bank

City: Gays Mills WI

Print Name: Phil Whitehead

Signature: Phil Whitehead

Bank Affiliation: Bank of New Glarus

City: New Glarus, WI

Print Name: KIMBERLY LANTTA

Signature: Kimberly Lantta

Bank Affiliation: Bank of New Glarus

City: New Glarus, WI

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Mary A. Bomkamp
Signature: Mary A. Bomkamp
Bank Affiliation: Highland State Bank
City: Highland, WI

Print Name: Rachel Goodell
Signature: Rachel Goodell
Bank Affiliation: Unity Bank
City: Augusta

Print Name: David J. Kratz
Signature: [illegible]
Bank Affiliation: Greenleaf Wayside Bank
City: Greenleaf WI

Print Name: Kirk A. Stovers
Signature: [illegible]
Bank Affiliation: Bank of New Glarus
City: New Glarus

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Alan E. Zastrow

Signature: Alan E. Zastrow

Bank Affiliation: Markesan State State

City: Markesan, WI 53946

Print Name: Dennis R. Meyer

Signature: Dennis R. Meyer

Bank Affiliation: Independence State Bank

City: Independence, WI

Print Name: GARY B. SCHLOSSTEIN

Signature: G. B. Schlosstein

Bank Affiliation: ALLIANCE

City: MONDOVI

Print Name: John Slatky

Signature: John Slatky

Bank Affiliation: Bank of Luxemburg

City: Luxemburg WI

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Mike Marx

Signature: M Marx

Bank Affiliation: CBW

City: Madison, WI

Print Name: JOHN EIMON

Signature: John Eimon

Bank Affiliation: GREAT MIDWEST BANK

City: BROOKFIELD, WI

Print Name: TOM WESTON

Signature: Tom Weston

Bank Affiliation: CITIZENS FIRST BK

City: VIROQUA, WI

Print Name: ______________________

Signature: ______________________

Bank Affiliation: ______________________

City: ______________________

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Maria Bruggink
Signature: Maria Bruggink
~~Bank Affiliation~~: Wipfli LLP
City: Wausau, WI

Print Name: Mary Boatz
Signature: Mary Boatz
~~Bank Affiliation~~: Wipfli LLP
City: Eau Claire, WI

Print Name: Jason Totzke
Signature: Jason Totzke
~~Bank Affiliation~~: Wipfli LLP
City: Green Bay, WI

Print Name: KENNETH J. UTTER
Signature: Kenneth J. Utter
~~Bank Affiliation~~: WIPFLI LLP
City: MADISON, WI

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Jonathan Ferebee

Signature:

~~Bank Affiliation~~:

City: Memphis, TN

Print Name: DAVID HOLSTED

Signature:

~~Bank Affiliation~~:

City: Little Rock, AR

Print Name: FRED Kacy

Signature:

Bank Affiliation:

City: Memphis TN

Print Name:

Signature:

Bank Affiliation:

City:

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: ERIC GERBIN
Signature: [signature]
Bank Affiliation: FIRST NATIONAL BANK - BERLIN
City: BERLIN, WI

Print Name: Tom Jensen
Signature: Thomas L. Jensen
Bank Affiliation: 1st National Bank - Berlin
City: Berlin, WI

Print Name: ______
Signature: ______
Bank Affiliation: ______
City: ______

Print Name: ______
Signature: ______
Bank Affiliation: ______
City: ______

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Aaron D. Schmanski

Signature: A. D. Sch

Bank Affiliation: BOSC, Inc.

City: Milwaukee, WI

Print Name: MARC GALL

Signature: Marc Gall

Bank Affiliation: Bank of Oklahoma, BOKF NA.

City: Milwaukee WI

Print Name: Paul Hoffmann

Signature: Paul Hoffmann

Bank Affiliation: Monona State Bank

City: Monona, WI

Print Name: ______

Signature: ______

Bank Affiliation: ______

City: ______

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Dean Olson

Signature: Dean Olson

Bank Affiliation: Charter Bank Eau Claire

City: Eau Claire, Wi

Print Name: David Pokrandt

Signature: [signature]

Bank Affiliation: Charter Bank Eau Claire

City: Eau Claire, WI

Print Name: Troy Werk

Signature: [signature]

Bank Affiliation: Charter Bank Eau Claire

City: Eau Claire, WI

Print Name: Paul Kohler

Signature: [signature]

Bank Affiliation: Charter Bank Eau Claire

City: Eau Claire

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Kelly W. Bauer

Signature: Kelly W Bauer

Bank Affiliation: Bank of Wisconsin Dells

City: Wisconsin Dells

Print Name: Larry Gehrke

Signature: [illegible]

Bank Affiliation: Bank of Wisconsin Dells

City: Wisconsin Dells.

Print Name: ______________________

Signature: ______________________

Bank Affiliation: ______________________

City: ______________________

Print Name: ______________________

Signature: ______________________

Bank Affiliation: ______________________

City: ______________________

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Dan Kittleson
Signature: [illegible]
Bank Affiliation: EVP & CFO Oak Bank
City: Fitchburg, WI

Print Name: Sigurd A. Bringe
Signature: [illegible]
Bank Affiliation: Bank of Deerfield
City: Deerfield, WI

Print Name: Jill Kollock
Signature: [illegible]
Bank Affiliation: Bancroft State Bank
City: Bancroft

Print Name: __________
Signature: __________
Bank Affiliation: __________
City: __________

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Alice Hensen
Signature: Alice Hensen
Bank Affiliation: Bank of Sun Prairie
City: Sun Prairie

Print Name: Daniel J Ravenscroft
Signature: Daniel J Ravenscroft
Bank Affiliation: Royal Bank
City: Elroy

Print Name: Kevin L Ravenscroft
Signature: KLR
Bank Affiliation: Timberwood Bank
City: Tomah

Print Name: Tom Trautsch
Signature: Tom Trautsch
Bank Affiliation: Timberwood Bank
City: Tomah, WI

DAN HEIKE
Daniel J Heike
ALLIANCE BANK
[illegible]

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: DALE OPPERMAN

Signature: Dale Opperman

Bank Affiliation: RIVER VALLEY BANK

City: WAUSAU, WISCONSIN

Print Name: ____________________

Signature: ____________________

Bank Affiliation: ____________________

City: ____________________

Print Name: ____________________

Signature: ____________________

Bank Affiliation: ____________________

City: ____________________

Print Name: ____________________

Signature: ____________________

Bank Affiliation: ____________________

City: ____________________

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: SCOTT KOPP

Signature:

Bank Affiliation: BANK OF GALESVILLE

City: GALESVILLE, WI 54630

Print Name: Carl M Axness

Signature: Carl M Axness

Bank Affiliation: Union Bank of Blair

City: Blair WI 54616

Print Name: ______________________

Signature: ______________________

Bank Affiliation: ______________________

City: ______________________

Print Name: ______________________

Signature: ______________________

Bank Affiliation: ______________________

City: ______________________

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Jon Reetz

Signature: [signature]

Bank Affiliation: Great Midwest Bank, SSB

City: Brookfield WI

Print Name: JOHN SCHROEDER

Signature: [signature]

Bank Affiliation: GREAT MIDWEST BANK SSB

City: BROOKFIELD WI 53005

Print Name: Dennis Doyle

Signature: [signature]

Bank Affiliation: Great Midwest Bank

City: Brookfield, WI

Print Name:

Signature:

Bank Affiliation:

City:

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Jeff Blada

Signature: [signature]

Bank Affiliation: The Baraboo National Bank

City: Baraboo, WI 53913

Print Name: ______________________

Signature: ______________________

Bank Affiliation: ______________________

City: ______________________

Print Name: ______________________

Signature: ______________________

Bank Affiliation: ______________________

City: ______________________

Print Name: ______________________

Signature: ______________________

Bank Affiliation: ______________________

City: ______________________

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Jeff Whitrock

Signature: Jeff Whitrock

Bank Affiliation: Pioneer Bank

City: Auburndale WI 54412

Print Name: ______________________

Signature: ______________________

Bank Affiliation: ______________________

City: ______________________

Print Name: ______________________

Signature: ______________________

Bank Affiliation: ______________________

City: ______________________

Print Name: ______________________

Signature: ______________________

Bank Affiliation: ______________________

City: ______________________

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: John D. Dorshorst
Signature:
Bank Affiliation: Gratiot State Bank
City: Gratiot, Wi 53541

Print Name: Chris J. Prange
Signature:
Bank Affiliation: American Bank + Trust
City: Cuba City, WI

Print Name: Randy L. Balk
Signature:
Bank Affiliation: INTERCITY STATE BANK
City: SCHOFIELD, WI 54476

Print Name: STEVEN L. ZEMAN
Signature:
Bank Affiliation: UNION STATE BANK
City: WEST SALEM WI 54669

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: Richard G Busch
Signature:
Bank Affiliation: Boyd Bank
City: Gays Mills WI

Print Name: Jim Tubbs
Signature:
Bank Affiliation: STATE BANK OF CROSS PLAINS
City: CROSS PLAINS

Print Name:
Signature:
Bank Affiliation:
City:

Print Name:
Signature:
Bank Affiliation:
City:

Community Bankers of Wisconsin Petition to the Federal Reserve, OCC, and the FDIC Regarding Basel III
September 12, 2012

Sign our Petition:

Print Name: HB Pomeroy

Signature: HB Pomeroy

Bank Affiliation: International Banking Amherst

City: Amherst WI

Print Name: Paul C. Adamski

Signature: Paul C. Adamski

Bank Affiliation: The Pineries Bank

City: Stevens Point, WI

Print Name: ____________________

Signature: ____________________

Bank Affiliation: ____________________

City: ____________________

Print Name: ____________________

Signature: ____________________

Bank Affiliation: ____________________

City: ____________________