

From: Gerry Owen [mailto:Gerry.Owen@savannahriverbanking.com]
Sent: Thursday, July 26, 2012 11:37 AM
To: Comments
Subject: FDIC RIN 3064-AD95

To Whom it May Concern:

Currently, adding other comprehensive income to Tier I Capital would be beneficial to most banks because we all have large unrealized gains in our bond portfolios; however, as interest rates rise this would be devastating because most of those unrealized gains would turn to unrealized losses. If enacted this could fundamentally change how banks invest in bonds. I encourage you to take a global look at how this proposal would affect banks.

Sincerely,

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