



CORBIN HENDERSON COMPANY

INVESTMENT REAL ESTATE

August 13, 2012

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments/Legal ESS RIN 3064-AD95
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Dear Mr. Feldman:

Bank regulators, bank directors and shareholders across America and beyond have experienced the fatigue of the most devastating recession in their adult life. To suggest the past five years have been challenging times is an understatement. For most of my adult life I have been a banker, when younger and a bank director in my older and more experienced years. Indeed, I currently serve as a director and have served two other banks in my adult life.

From the point of view of the Community Bank director, regulations proposed under Basil III pose yet another threat to the income statement of many smaller institutions at a time when progress is offering optimism in stabilizing and returning to profitability. For example, additional personnel in back room operations, compliance oriented obligations not contributing to growth opportunity, serves as a threat to turning commercial banking around for the better and setting the stage for much needed commercial lending to get small businesses moving again. Thankfully, there is tangible evidence of this improvement and increasing lending remains a major focus.

My colleagues on the bank board have dedicated countless hours supporting senior management in policies that are working and improvement is evident, albeit never as quickly as we would like it. It is disheartening to think that the likely negative effects of Basil III will threaten our progress at such a vulnerable time in community banking. I urge you to exempt Community Banks from this potential regulation and offer other supportive measures to get banks lending again.

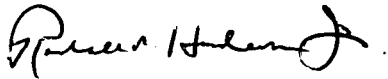
We are different from the larger banks. We are not granted the same access to Capital Markets and regulatory strain on smaller banks presents an unfair competitive disadvantage to this important segment of the banking world. A "one size fits all" approach to supporting a return to banking stability will not be fair and will threaten too many Community Banks that will otherwise pull out successfully in these challenging times if left to a more reasonable approach to recovery. Basil III from our perspective is not reasonable, not relevant for our banking world.

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We are recovering. We are doing it without TARP or any other government assistance. I urge you as regulators to approach this decision from a sense of down on the ground “in touch with communities and small business needs” sensitivity, and allow Community Banks to continue the hard work in restoring the lending needs to our cities and neighborhoods. More regulatory pressure is not the answer, and especially as compared to your objectives with the mega banks of America and beyond.

Thank you for going the extra step to distinguish the differences associated with the community banking model to the large, even giant, lending institutions that also play an important, yet very different role across the banking world.

Sincerely,

A handwritten signature in black ink, appearing to read "Randall P. Henderson, Jr.", with a stylized flourish at the end.

Randall P. Henderson, Jr.
President and CEO
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Director
First Community Bank
Fort Myers, FL