

TO: Mr. Robert Feldman

International Bank of Commerce in Zapata Texas is a small bank which has been in existence for 30 years. We have grown the bank since the opening date on February 4, 1984 from a \$2 million equity injection to the current \$550 million asset base. We serve eight counties in rural Texas with 12 branches and 120 employees. Most of our employees are Mexican American females and a minimal number (less than 5) are Anglo Americans. We do not have African Americans because there are no applicants from that minority. Our communities have minimal population of African Americans.

Our customer base is mostly Mexican Americans and a minimal number of African American customers. Possibly, 20% of our customer base is Anglo American. We have significant number of public funds accounts from local school districts in the eight counties we serve.

We have been very active with local universities. We have provided financial assistance for programs at Texas A & M-Kingsville, Texas A & M International at Laredo, Laredo Community College, Coastal Bend Community College, and the University of Texas in Austin. Our staff raised \$75,000 for the Mariachi and Conjunto (Mexican American music) Ensembles at the Butler School of Music at UT-Austin. We raised \$25,000 for the Rodeo Team at Texas A & M Kingsville and \$75,000 for a graduate student to study the quail habitat in our market. IBC provides approximately \$50,000 per year to Texas A & M Kingsville (serving mostly Mexican Americans and African Americans) in athletic support, College of Business Administration support, and TAMUK Foundation support. My family partnership funded a \$1 million endowment fund for scholarships at Texas A & M International in Laredo.

We sponsor and manage an annual sporting clay shooting tournament for the benefit of the Boys and Girls Club in Zapata and annually raise some \$50,000+ for young Mexican American children. Our staff is extremely active with the local county fairs and purchase projects to help defray the cost of that educational experience for our children in our area.

Our staff's most important project, the Tejano Monument, was a 12 year journey to emplace a monument on the capitol grounds in Austin Texas to honor the contribution of Mexican Americans to Texas Culture and Texas History. That project was unveiled on March 29, 2012. The Texas Bankers' Association awarded their most prestigious award, the TBA 2013 Cornerstone Award, to the bank for its efforts. It is important to note that IBC contributed over \$200,000 over the twelve year journey. My family partnership contributed approximately \$125,000.

Our compliance costs have greatly increased over the last few years, especially after the passage of the Dodd-Frank Act. Our ability to lend in rural Texas is limited by the underwriting standards mandated by Dodd-Frank. Generally, our business customers do not have the level of sophistication with regard to financial statement preparation—we deal with family businesses. In order to survive, our staff must reflect the ethnicity of our market. We do not need directives from Washington to ensure our employee base includes all ethnicities in our market.

The metrics suggested in your proposal will require a huge expense in software and training to comply with the proposal. Even if we incur those expenses, our hiring and retention practices would not change.

We respectfully request that the proposal be withdrawn. Regulators can devote some time to develop a simple, cost effective procedure to enable community banks to comply with this section of the Dodd-Frank Act.

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