

From: Liberty Bancshares, Inc., Lloyd McCracken  
Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules  
Subject: Regs H & Y Regulatory Capital Proposals

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Comments:

I urge you to grant at least a 90-day extension of the public comment period for the joint-agency Basel III capital standard proposals.

The comment period, scheduled to end on September 7, 2012, does not provide sufficient time to examine adequately the implications and impact of the proposal on our bank and our customers and then to provide comments reflecting the information that the agencies will need to make fully informed judgments.

This is particularly true for community banks such as ours that were not anticipating the Basel III proposal to be applicable to them.

The breadth and scope of the draft proposal poses significant issues both to banks individually and well as to the banking system as a whole. I was disappointed that a proposal of such magnitude would be issued with what is clearly an inadequate period of time for careful review and study by banks and others who would be significantly impacted.

Few banks have designated staff to review the Basel III proposal. As a result, our review of the proposal has to compete for bank staff time with day-to-day bank operations.

The Basel III proposal has not been formally published in the Federal Register.

The drafts that have been released by the banking agencies are just that, drafts. As a result, we are uncertain what will be contained in the final proposal. The banking agencies should start the comment period once the proposal is published. The comment period should run at least 90 days.

Thank you for your consideration. I look forward to you granting a 90 day or longer extension of the comment period.

Lloyd McCracken, Jr.  
Liberty Bancshares, Inc.