

From: Riddell National Bank, H. Michael Lawson  
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:

August 7, 2012

Jennifer J. Johnson,  
Secretary  
Board of Governors of the Federal Reserve  
Washington, DC 20551

Robert E. Feldman,  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429

Office of the Comptroller of the Currency  
250 E Street, S.W.  
Mail Stop 2-3  
Washington, D.C. 20219

RE: Basel III Capital Proposals

Ladies and Gentlemen:

As CEO of Riddell National Bank, a \$185M community bank located in West Central Indiana, I would appreciate it if you would consider giving me and the rest of the banking industry in the U.S. some additional time to sort through the Basel III Capital Proposals.

I'm not sure what effect the proposals are going to have on our small bank yet. I understand that they might cause us to change our lending for certain types of loans. I don't know yet what impact that might have on our earnings. I'm concerned that it might not be good for our local community if we're going to have to stop lending for homes or small businesses.

I think it's important to have a strong capital base. I know that's what has helped us survive as a community bank since June of 1885. I'm just not sure that all the provisions of the Basel III proposals should apply to all banks regardless of size. We've always tried to operate our bank as a small community bank should function. I'm concerned that regulations that are written as "one size fits all," might not fit our business model.

I've been attending webinars and seminars designed to help me and my colleagues to understand Basel III. I've found that even the presenters and speakers have had to side-step a lot of questions we have because they don't know how the regs are going to be interpreted. That concerns me. Too many "mights" mean we need more time to figure out our concerns and let you know what they are. Please give us at least 90 days beyond September 7, 2012 to do this. There's too much at risk to keep that deadline.

Thanks!

H. Michael Lawson  
Riddell National Bank

