

From: Two Rivers Financial Group, John H. Olson
Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules
Subject: Regs H & Y Regulatory Capital Proposals

Comments:

Date: Oct 22, 2012

Proposal: Regulatory Capital Rules: (1) Implementation of Basel III, Minimum Regulatory Capital Ratios, Capital Adequacy, & Transition Provisions; (2) Standardized Approach for Risk-weighted Assets; (3) Advanced Approaches Risked-based Capital Rule & Market Risk [R-1442]
Document ID: R-1442

Revision: 1

First name: Jim

Middle initial: H

Last name: Olson

Affiliation (if any): Two Rivers Financial Group

Your comment:

Dear Chairman Bernanke and Federal Reserve Board Members, Two Rivers Financial Group is a financial holding company engaged in providing banking, insurance, and investment services to central and southeast Iowa. We are headquartered in Burlington, Iowa and have employ approximately 320 financial service associates. We have great concerns regarding the implementation of the BASEL III capital guidelines on community banking organizations. While I do not question the need for international capital guidelines for large banking organizations, imposing such rules on community banking organizations appears misguided and poses obstacles and unintended consequences for community banks serving smaller regional markets. Our access to capital varies significantly from capital markets available to large public companies and creates an even larger uneven playing field between community banks and our national and international banking peers. The sheer complexity associated with defining the risk rated asset classifications appears onerous and unnecessary for community banking organizations. I would respectfully ask the Federal Reserve to give further consideration to not impose the proposed BASEL III capital guidelines on the community banks that serve as the economic partner to our clients and communities which we try diligently to serve. Implementing guidelines to restrict our growth will have an adverse impact on our clients and communities. Thank you for your thoughtful consideration. Sincerely, Jim H. Olson President Two Rivers Financial Group