

October 19, 2012

Robert E. Feldman, Executive Secretary  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, N. W.  
Washington, DC 20429  
FDIC RIN 3064-AD95, FDIC RIN 3604-AD96, & FDIC RIN 3064-D97

Office of the Comptroller of the Currency  
250 E Street, S. W., Mail Stop 2-3  
Washington, DC 20219  
Docket ID OCC-2012-0008, Docket ID OCC-2012-0009

Jennifer J. Johnson, Secretary,  
Board of Governors of the Federal Reserve System,  
20<sup>th</sup> Street and Constitution Avenue, N. W.,  
Washington, DC 20551  
Docket No. R-1430; RIN No. 7100-AD87, Docket No. R-1442; RIN No. 7100-AD87

RE: New Basel III Capital  
Requirements

Dear Sir or Madam:

We are a small community bank in Clinton, Oklahoma. We have been a camels rated number 1 for a long time and have maintained a very strong capital structure with no preferred stock, trust preferred securities or subordinated debentures or other lower tiered obligations.

The above have been a big benefit financially regarding our FDIC insurance premiums and should be a benefit regarding any capital structure regulations.

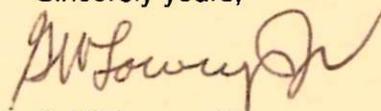
We don't understand the reasoning for including banks such as ours to new universally applied Basel III standards. Even if it doesn't affect us having to maintain more capital there will be many hours spent and a large amount of cost involved in compliance with continually figuring a "Capital Buffer" and risk rating loans. Time spent with several employees working on this will take away from them serving customers and serving the community. Loans officers worrying about how the risk ratings are going to apply will affect their ability to lend as they have in the past. This could adversely affect the credit granting process and serving our customers.

We don't have an understanding of the implications that losses or gains on available for sale securities will have on new requirements. A large percentage of our bond portfolio is available for sale so this could be a major issue for us.

It seems that there are many complex issues to be hashed out and who they all apply to so hopefully time can be extended for at least 90 days to work out problems and hopefully exemptions before any final rules are applied.

We will appreciate any consideration that can be given.

Sincerely yours,



G. W. Lowry, Jr.  
President