

October 4, 2012

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve
System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551

Office of the Comptroller of the Currency
250 E Street, SW
Mail Stop 2-3
Washington, DC 20219

Robert E. Feldman
Executive Secretary
Attention: Comments/Legal ESS
Federal Deposit Insurance Corporation,
550 17th Street, N.W.
Washington, D.C. 20429

Re: Basel III Capital Proposals

Ladies and Gentlemen:

Thank you for the opportunity to provide comment on the Basel III proposals¹ that were recently issued for public comment by the Federal Reserve Board, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation.—

My name is Virginia Ratliff and I work for a Community Bank in West Virginia. I feel that Community banks should be allowed to continue using the Basil 1 framework for computing their capital requirements. I do not feel that Community banks engaged in the highly leveraged activities that severely depleted capital levels . Larger banks operate more on transactions and tend to ignore customer relations. We are here for our customers!!! The tougher regulations need to be put on the larger banks to better manage the ability to absorb losses.

I also feel that the risk weight framework under Basil III is too complicated and will penalize community banks. This inturn will jeopardize the housing recovery. These new regulations will deprive customers from many of their financing options for residential property. Community Banks will also be forced to do costly upgrades to be a ble to track mortgage loan to value ratios in order to determine the proper risk weight categories for mortgages.

I am afraid with Basil III going into effect I will loose my job and this is extremely frustrating since I live in an area that has already been hit hard with job losses. Not only do we have too many people loosing their homes, we will not be able to help new home onwers get a loan to purchase their home.

Sincerely

Virginia Ratliff