

From: Benchmark Community Bank, Neil Burke
Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules
Subject: Regs H & Y Regulatory Capital Proposals

Comments:

I am writing to request a 90 day extension to the comment period related to the joint proposed rulemakings on minimum regulatory capital and the standardized approach for risk-weighted assets titled Regulatory Capital Rules: Regulatory Capital, Implementation of Basel III, Minimum Regulatory Capital Ratios, Capital Adequacy, Transition Provisions, and Prompt Corrective Action and Regulatory Capital Rules: Standardized Approach for Risk-Weighted Assets; Market Discipline and Disclosure Requirements.

The size, scope, and impact of these proposals represent a challenging obstacle for community banks and are presented for review at a time of extensive economic difficulty for both the domestic and global economy. This extension will allow a more thorough study of the proposals, allowing us to assess their impact on our balance sheet, ownership structure, general operations, and system capabilities. Without an appropriate extension of the proposals, all banks are exposed to heightened risks in capital adequacy, mission, and operational integrity.

Sincerely,

Neil Burke
Benchmark Community Bank