

From: Great Lakes Bankers Bank, Charlotte W. Martin
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 encourage a 90-day extension for the public comment period for the Basel III proposed capital standards policy. As Basel capital standards have always been proposed as applying only to those institutions with international activity, the proposal to apply these standards to ALL financial institutions has taken many bankers by surprise.

There is still a great deal of confusion among community bankers as to how - or even whether - they are affected by this proposal as the exemption for holding companies under \$500MM has led some to wrongly assume their banks are also exempt. Time is needed for the industry to become better educated on the complexities of the proposal and understand the potential impact on their institutions and the ramifications to the industry.

Thank you for your consideration of an extension and we will submit a more thorough comment at a later date.

Charlotte W. Martin
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