

From: Arvest Bank, Cathy Ruppel
Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules
Subject: Regs H & Y Regulatory Capital Proposals

Comments:

The American Bankers Association (AmBA) and other national trades jointly requested a 90-day extension, please consider the following:

The comment period, scheduled to end on September 7, 2012, does not provide sufficient time to examine adequately the implications and impact of the proposal on my bank and my customers and then to provide comments reflecting the information that the agencies will need to make fully informed judgments. This is particularly true for community banks that were not anticipating the Basel III proposal to be applicable to them.

Few banks have designated staff to review the Basel III proposal. As a result, our review of the proposal has to compete for bank staff time with day-to-day bank operations.

The Basel III proposal has not been formally published in the Federal Register. The drafts that have been released by the banking agencies are just that, drafts. As a result, we are uncertain what will be contained in the final proposal. The banking agencies should start the comment period once the proposal is published. The comment period should run at least 90 days.

Thank you for your consideration,

CATHY RUPPLE
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