

From: Northwestern Bank, Gerald Jacobson
Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules
Subject: Regs H & Y Regulatory Capital Proposals

Comments:

I would like you to consider extending the time frame for comment on Basel III for 90 more days. Our operations people are trying to figure out how we are going to recode loans in order to get the correct data in calculating our risk based assets and frankly it looks to be a lot of hand work in doing the calculation. We do not have a method on how we are going to do the calculation on a ongoing basis as rollover loans occur and new evaluations or appraisals are done on existing loans without creating a significant amount of hand work and of course double checking to avoid errors (which with the amount of people touching the data - errors will occur). Our Bank is Northwestern Bank in Chippewa Falls Wisconsin, member of the Federal Reserve Bank of Minneapolis

Gerald Jacobson
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