



# NC BANKERS

NORTH CAROLINA BANKERS ASSOCIATION

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July 3, 2012

Office of the Comptroller of the Currency  
250 E Street, SW  
Mail Stop 2-3  
Washington, DC 20219  
[regs.comments@occ.treas.gov](mailto:regs.comments@occ.treas.gov)

Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve  
System  
20th Street and Constitution Avenue, N.W.  
Washington, D.C. 20551  
[regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)

Robert E. Feldman  
Executive Secretary  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation,  
550 17th Street, N.W.  
Washington, D.C. 20429  
[comments@fdic.gov](mailto:comments@fdic.gov)

Re: Basel III Capital Proposals

Ladies and Gentlemen:

On behalf of the North Carolina Bankers Association and its 128 member banks and trust companies, we are writing to request an extension of the comment period for three notices of proposed rulemaking. These notices would replace the current capital rules of the Federal Reserve, the OCC, and the FDIC. Due to the broad scope of the proposals and their applicability to all business lines at banks, bankers need sufficient time to evaluate the proposals and understand their impact. For this reason, we ask that the comment period, scheduled to end on September 7, 2012, be extended by at least an additional 90 days to allow more time for banks to examine the impact of the proposals and to provide comments.

Thank you for considering this request. Please contact us if you have any questions.

Sincerely,

Nathan R. Batts  
Senior Vice President & Counsel

E. Dawn Thompson  
Associate Counsel