

# KENDALL STATE BANK

406 Broadway, PO Box 188  
Valley Falls, Kansas 66088  
Phone 785-945-3231 Fax 785-945-6621  
Member F.D.I.C.

July 31, 2012

**Department of the Treasury: Comptroller of the Currency**

Subject Line: Regulatory Capital Rules: Standardized Approach for Risk-weighted Assets;  
Market Discipline and Disclosure Requirements

E-mail: [regs.comments@occ.treas.gov](mailto:regs.comments@occ.treas.gov); or FAX: 202-874-5274

**Federal Reserve System**

Subject Line: Docket No. R-1442; RIN No. 7100 AD 87 Regulatory Capital Rules

E-mail: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov); or FAX: 202-452-3819 or 202-452-3102

**Federal Deposit Insurance Corporation**

Subject Line: FDIC RIN 3064-AD 96 Regulatory Capital Rules

E-mail: [comments@FDIC.gov](mailto:comments@FDIC.gov)

Dear Sir or Madam:

We appreciate the opportunity to submit preliminary comments to the Federal banking regulatory agencies regarding the proposal regarding Regulatory Capital Rules: Standardized Approach for Risk-weighted Assets, Market Discipline and Disclosure Requirements. The Kansas Bankers Association (KBA) is a non-profit trade organization having 294 of the 297 Kansas chartered banks as members.

The Kendall State Bank would respectfully request that an extension of time be given to complete comments on this proposal. This proposal covers many very important aspects of capital calculations including: proposed changes to the general risk-based capital requirements for determining risk-weighted assets; proposed alternatives to credit ratings for calculating risk-weighted assets for certain assets such as residential mortgages, securitization exposures and counterparty credit risk; and proposed revisions of minimum risk-based capital requirements and criteria for regulatory capital.

Just as each aspect of this proposal was carefully crafted and considered by Basel III, and each regulatory agency, we ask for the appropriate time for *our small rural community bank* to sift through the proposed changes to gauge their effect on current levels of capital and the ability to increase those levels as would be necessary.

With the above in mind, we would request a 90- to 120-day extension of the comment period deadline. Thank you in advance for your consideration of our request.

Sincerely,

  
Jayne L. Coleman  
President/CEO