August 6, 2012

RE: Basel III comment period

To Whom It May Concern:

I write on behalf of Three Rivers Bank of Montana. Three Rivers Bank is a locally owned state chartered community bank with $114 million in assets. We are located in Kalispell, Montana.

We hereby request a 90-day extension for public comment for the joint-agency proposed Basel III capital standards. Presently, the comment period is set to end on September 7, 2012.

The management of Three Rivers Bank requests the extension for two reasons. First, the Basel III proposed capital standards are extremely complex and require additional time to review. Second, it appears, the proposals could have a negative impact on Three Rivers Bank, other community banks and the loan terms of our small business customers. The additional time will allow us to run simulations providing us with details to formulate comments to the different agencies.

Presently, Three Rivers Bank opposes being subject to these capital standards, which were originally invoked for large financial institutions. Applying the Basel III Capital standards to every financial institution regardless of size will significantly increase the minimum capital levels and risk-weights for various asset classes. We have concerns our longstanding model of dealing with small businesses will be jeopardized.

We are aware the House Financial Services Committee Chairman Spencer Bachus has asked Federal Reserve Chairman Ben Bernanke for an additional 90 more days for public comment. We join in on Chairman Bachus request.

Thank you for your consideration.

Sincerely yours,

A.J. King
President