



August 7, 2012

Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve  
System  
20th Street and Constitution Avenue, N.W.  
Washington, DC 20551

Robert E. Feldman  
Executive Secretary  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation  
550 17th Street, N.W.  
Washington, DC 20429

RE: Basel III Capital Proposals

Ladies and Gentlemen:

I am writing to request an extension on the comment period for the Basel III proposals<sup>1</sup> that were recently approved by the Federal Reserve Board, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation.

United Bank & Trust is a \$900 million community institution located in Ann Arbor, Michigan. These proposals would have a significant impact on the nature of financial services for our bank. Due to the broad scope of the proposals and their applicability to all business lines across all banks, we need sufficient time to evaluate the operational complexities of the proposals and understand their significant impact.

Specifically, the proposed treatment regarding the risk weighting of 1-4 family residential mortgages (first lien and second lien positions) seems to be quite complex and could have significant impact on capital requirements (and lending opportunities) for our institution and similar institutions that provide mortgage and home equity loans in their communities. We are particularly troubled by the potential capital requirements for unused HELOC commitments, and would like to provide a thoughtful and thorough analysis of the potential impact of the proposed risk weighting for this type of loan.

We are concerned that the comment period, scheduled to end on September 7, 2012, does not provide sufficient time to examine adequately the implications and impact of the proposals and

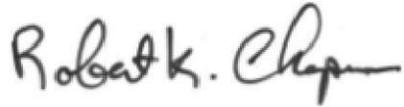
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<sup>1</sup> The proposals are titled: *Regulatory Capital Rules: Regulatory Capital, Implementation of Basel III, Minimum Regulatory Capital Ratios, Capital Adequacy, and Transition Provisions*; *Regulatory Capital Rules: Standardized Approach for Risk-weighted Assets*; *Market Discipline and Disclosure Requirements*; and *Regulatory Capital Rules: Advanced Approaches Risk-based Capital Rules; Market Risk Capital Rule*.

to provide comments reflecting the information that the regulators will need to make fully informed judgments.

I, therefore, respectfully request that the banking agencies consider extending the current September 7, 2012 comment period deadline for at least an additional 90 days.

Sincerely,

A handwritten signature in black ink that reads "Robert K. Chapman". The signature is written in a cursive style with a prominent initial "R" and a long, sweeping underline.

Robert K. Chapman  
President & Chief Executive Officer  
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[rchapman@ubat.com](mailto:rchapman@ubat.com)