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August 2, 2012

Mr. Ben Bernanke  
Chairman  
Board of Governors of the Federal Reserve System  
20th Street and Constitution Avenue, NW  
Washington, DC 20551

Mr. Martin J. Gruenberg  
Acting Chairman  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429

Mr. Thomas J. Curry  
Comptroller  
Office of the Comptroller of the Currency  
250 E Street, SW  
Washington, DC 20219

Re: Proposed Rulemaking on Minimum Regulatory Capital and the  
Standardized Approach for Risk-weighted Assets

Dear Sirs:

The Independent Bankers Association of Texas (IBAT), a trade association representing approximately 2000 independent community banks and branches domiciled in Texas, requests an extension on the comment period for the jointly proposed rulemaking *Regulatory Capital Rules: Regulatory Capital, Implementation of Basel III, Minimum Regulatory Capital Ratios, Capital Adequacy, and Transition Provisions* (Basel III NPR) and *Regulatory Capital Rules: Advanced Approaches Risk-based Capital Rules; Market Risk Capital Rule* (Advanced Approaches and Market Risk NPR) (or collectively, the NPRs) from September 7, 2012 to December 31, 2012.

Additionally, IBAT requests that the banking regulatory agencies (the Agencies) develop a calculator for community banks to analyze the effects of the NPRs on the community banks in time for banks to use it to analyze and comment on the effects of the proposal.

The complexities of the proposals challenge community banks and their advocates to prepare meaningful comments for submission on or before September 7, 2012. IBAT has asked its community bank members to submit comments on the proposals; however, our members are unable to make specific comments without the tools necessary to analyze the precise impact on their institutions. When asked about available calculators, we learned that there is one available, but that it would cost each institution

Mr. Ben Bernanke  
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Mr. Thomas J. Curry  
August 2, 2012  
Page Two

several thousands of dollars. Without such a calculator, our members' comments will be general and likely based on the comments of IBAT and other associations. A calculator would allow our members to provide the Agencies with meaningful feedback, and would give the Agencies an accurate picture of the effect of the proposals.

If the Agencies will grant an extension to December 31, 2012 and provide the requested calculator, IBAT, its members, and other community banks and community bank advocates will be able to further study the proposal, assess the precise impact on the community banking industry and specific community banks, and provide the Agencies with comments that will be more meaningful, precise, and helpful than they will be capable of submitting on or before the September 7, 2012 deadline.

If you have any comments or need to discuss our request, please contact Steve Scurlock, Executive Vice President, at (512) 474-6889 or [sscurlock@ibat.org](mailto:sscurlock@ibat.org).

Thank you for your consideration of this request.

Sincerely,



Christopher L. Williston, CAE  
President and CEO

cc: Robert E. Feldman, Executive Secretary  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington DC 20429