

October 18, 2012

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

Re: Basel III Capital Proposals

Ladies and Gentlemen:

This letter is to comment on the proposed capital rules. These rules have implications throughout the banking industry, but are especially difficult for community banks like Country Club Bank in Kansas City, MO. While I'm sure I do not understand fully the implications of the new Basel III, the senior management at my bank has made it clear that this will have adverse effects on our ability to serve our customers.

When the debacle occurred in 2008 some new standards were necessary. I believe the legislators overstepped the basics that were needed and inadvertently caused additional damage to the functioning of the banking system. I understand the need for more stringent capitalization standards for the large, complex national and international banks that helped create the latest banking crisis, but applying these same standards to community banks like Country Club Bank will have wide ranging (and largely unknown consequences). Our mission is to remain a viable service to our communities; this will only make it harder for us to achieve our goal. Our legislators need to be more concerned about promoting small community business, not over regulating it.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael R. Gross", written in a cursive style.

Michael R Gross