Kansas Bankers Association

July 30, 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; 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; 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

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 KBA 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 KBA members 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.

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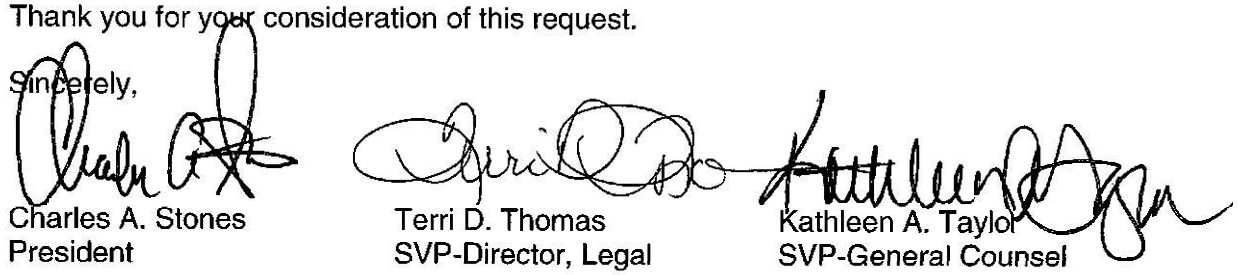
The KBA requests a 90- to 120-day extension of the comment period deadline. With bankers having just received nearly 1,400 pages of proposed changes covering Truth in Lending and RESPA, more time is needed to shift gears, and to absorb these proposed changes in detail.

Thank you for your consideration of this request.

Sincerely,



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