September 26, 2012

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

Re: Comment on proposed Basel III regulatory capital rules/standards

Ladies and Gentlemen:

Thank you for the opportunity to provide comment on the Basel III proposals that were recently issued for public comment by the Federal Reserve Board, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation. I founded Bank2 in 2002 for the Chickasaw Nation. They own 100% of Bank2 and as a minority owned bank we have strived to serve all of our community with a special emphases towards Native Americans. 89% of our loans were made to Native Americans each of the past two years. One of our commercial customers told us he had gone to 16 other banks, (many of the largest banks in the state and our country were part of the 16 that said, “NO,”) and was turned down for a loan. Then he came to Bank2 and we made him the commercial loan that resulted in helping him build his business and become the SBA’s most recognized company in Oklahoma this past year. Bank2 earned the Department of Commerce “Access to Capital” award for 2011 because we provide many commercial loans to self employed entrepreneurs. His business has grown significantly and with his growth he has added a significant number of employees. If you enact Basel III our capital will be impaired to such a large extent that it will threaten the very existence of our bank. What will happen to this gentleman’s company? What will happen to his employees? What will happen to my employees? What will happen to the economy?

Sincerely,
Ross A. Hill
Founder and CEO
Bank2
909 S. Meridian
Oklahoma City, OK. 73108