



# Alpine Bank

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## Aspen

600 East Hopkins Avenue, Suite 001  
Aspen, Colorado 81611  
970-920-4800  
Fax 970-920-4274  
Loan Fax 970-920-3781

September 26, 2012

**Robert E. Feldman**, Executive Secretary

Attention: Comments/Legal ESS

Federal Deposit Insurance Corporation

550 17<sup>th</sup> Street N.W.

Washington, DC 20429

Delivered via email [comments@FDIC.gov](mailto:comments@FDIC.gov)

**Jennifer J. Johnson**, Secretary

Board of Governors of the Federal Reserve System

20<sup>th</sup> Street and Constitution Avenue N.W.

Washington, DC 20551

Delivered via email [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)

**Office of the Comptroller of the Currency**

250 E Street SE

Mail Stop 2-3

Washington, DC 20219

Delivered via email [regs.comments@occ.treas.gov](mailto:regs.comments@occ.treas.gov)

Re: Basel III Capital Proposals

OCC: Docket ID OCC-2012-0008

OCC: Docket ID OCC-2012-0009

FRB: Docket No. R-1430; RIN No. 7100-AD87

FRB: Docket No. R-1442; RIN No. 7100-AD87

FDIC: RIN 3064-AD95

FDIC: RIN 3064-AD96

Ladies and Gentlemen:

BASEL III raises major concerns about the long term viability of banks and the availability of credit in communities we serve!

Phasing out of Trust Preferred Securities (TRUPs), changing the treatment of unrealized gains and losses of Available for Sale Securities (AFS) and making the Risk Weighting of Assets more stringent are a recipe for community banks to have significantly less capital. This reduction in capital will have the effect of fewer loans to clients in our communities.

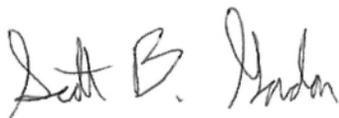
Alpine Bank will celebrate its 40<sup>th</sup> year as a successful community bank in western Colorado in a few short months. Never in our history have we been rated anything other than satisfactory in Capital. We have formed community partnerships in each of the 37 locations we serve and have had continuous ownership and consistent upper management throughout. We maintain 100,000+ household accounts, mostly small businesses in the communities we serve. We would very much like to continue to operate this way, and believe our customers feel the same way. We need them and they depend on us.

For several years the near constant refrain from the public, public officials, media and others has been for banks to lend more to create more jobs. Basel III goes in the opposite direction: less credit, more expensive credit, fewer businesses (especially small businesses) due to credit restrictions and greater expense, and fewer jobs. Banks caught between popular demand for more credit, and regulators' aversion to any risk is not what we need as a country. Society is not well served by risk-free banks that make no loans.

The nature, scope and complexity of the Basel III capital requirements appear to be a complete over-reaction. We believe this will have a big negative impact on individual businesses, the general economy and most importantly, the future of our community!

We request a complete withdrawal of the proposed regulation.

Sincerely,

A handwritten signature in black ink that reads "Scott B. Gordon". The signature is written in a cursive style with a large, looped "S" at the beginning.

Scott B. Gordon

President, Alpine Bank Aspen