

Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules

Description:

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Comment ID: 108575

From: First National Bank/First Frankfort Insurance, Jay Kennedy

Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules

Subject: Regs H & Y Regulatory Capital Proposals

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Comments:

Please accept this comment against the proposed Basel III capital requirements.

This proposal is not good for the thousands of banks like ours. The complexity of the formula does not match the complexity of our institution. I was interrupted three times by customers needing service in the time I completed the formula. By my calculations (I'm still not sure if it is correct), our capital would be inversely changed by more than 50 basis points.

If this proposal is what is best for the system, please consider exempting community banks who pose no systematic risk to the country.

Thank you for your consideration.

Jay Kennedy  
First National Bank/First Frankfort Insurance