

From: United Valley Bank, Tim Siegle
Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules
Subject: Regs H & Y Regulatory Capital Proposals

Comments:

Please regard this email as our banks strong opposition to Basil III. Implementing Basil III would have a huge negative impact on our bank. Using the mark to market value of our investment portfolio creates much uncertainty. We could have sufficient capital one quarter and be substantially undercapitalized the next, and the banks actual risk profile has not changed. We would have to hold to maturity, which would actually not allow us to take gains when it is appropriate.

By pushing the capital requirements up, the return on equity will decrease and therefore will have a negative impact on capital the banking industry can raise.

Because of these things, I highly encourage you to not proceed with Basil III.

Thank You,

Tim Siegle
United Valley Bank