

From: Robin S. Willingham
Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules
Subject: Regs H & Y Regulatory Capital Proposals

Comments:

October 11, 2012

Dear Comment Period Group:

Thank you for allowing the owners/employees of small COMMUNITY BANKS the opportunity to give you feed back on the Basel III proposals.

Our bank is a \$180 million asset bank. We are one of the largest consumer lenders in the State of New Mexico. We believe consumer lending is one of the biggest contributions we are able to make to the small rural communities. Our bank makes many residential mortgages that could not be made by any other bank. Also, when the mortgage crisis hit America, our bank did not have any foreclosures. We require a 20% down payment or a minimum of 80% loan to value on every home loan. Recently we were advised by bank examiners to help mitigate our interest risk on these 15 year/30 amortization loans by putting an 8 year balloon feature on every home loan. We know our customers very well and make it a point to provide exceptional customer service to every customer. Basel III proposed requirements of assigning a 150% risk weight to home loans with a balloon feature will significantly restrict or possibly eliminate our ability to make home loans, thus hurting our ability to service our rural communities. I respectfully urge you to understand small rural community borrowing needs, as well as understanding the big part community banks play in these rural communities before implementing regulations that could hinder our ability to service our customer's needs.

Sincerely,

Robin S. Willingham