

From: Susan Baker
Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules
Subject: Regs H & Y Regulatory Capital Proposals

Comments:

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I have been in banking for over 38 years and am writing to express my concern with the proposed Basel III implementation.

The Basel III proposal would narrow the definition of capital and increase the risk weightings of most assets for all banks and could be life threatening for some banks.

I am especially concerned about the new risk weightings for 1-4 residential loans. The banks that would be most impacted by the weightings are those with junior liens, HELOCs and balloon loans. Previously a lender, those were the majority of the loans I made to my customers, good hardworking individuals. This would have a huge impact on my bank and my community!

In Marketing we use this tag line, "Our Community, Our Bank". I feel this proposal would significantly and negatively alter the way my bank serves its customers and community and is unacceptable as we strive to improve and grow the American economy.

Thank you for your time and consideration.

Thank you,

Susan Baker