

From: Patterson State Bank, Bill Marin
Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules
Subject: Regs H & Y Regulatory Capital Proposals

Comments:

From: Bill Marin
Sent: Thursday, September 20, 2012 10:13 AM
To: 'regs.comments@federalreserve.gov'
Cc: Bill Marin; Strategic Planning Committee; T. Jefferson Fair
Subject: Basel III Docket No. 1442

Federal Reserve/Federal Regulators

I would like to make a few comments regarding the proposed Basel III regs.to be more concise my comments will be in the form of short bullet points that get to the heart of my concerns:

- *More undo regulatory burdens on community banks
- *The unrealized gains/losses on AFS securities could/would cause too much volatility in capital ratios
- *Risk weightings in the mortgage loan sector are excessive and will cause a "pull back" by community banks especially in residential loan portfolios
- *Risk weightings will cause unnecessary reporting burdens

These four bullet points point out the very basic problems that will only further constrain and/or severely restrict community banks from being able to help the communities they were designed to help. Please consider this when making your final decisions.thanks.Bill

Bill Marin
Patterson State Bank