

From: F&M Bank, Tirzah Wedewer
Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules
Subject: Regs H & Y Regulatory Capital Proposals

Comments:

As you are considering issuing the final guidance on the Basel III, I urge you to consider that "not all banks are the same". Instituting this proposal will create an additional burden on small banks with limited resources and tight budgets.

Farmers & Merchants Savings Bank currently is at \$335 mil in assets and with a team of 61 FT employees. All performance measurement ratios of the bank meet or exceed the state and national averages of our peers.

The additional burden of understanding these complex guidelines, along with the collection and compiling of the data required for this calculation, may require the hiring of additional staff - not to mention the time involved of other key employees. It will negatively affect our efficiencies and the overall financial performance of the bank.

I urge you to reconsider implementing this proposal all together, or at the minimum, exempt smaller institutions from this requirement.

Tirzah Wedewer
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