

# THE FIRST NATIONAL BANK OF BALLINGER

Member FDIC

P.O. Box 680  
911 Hutchings Ave.  
Ballinger, Texas 76821  
325/365-2525

E-mail: [fnbb@fnballinger.com](mailto:fnbb@fnballinger.com)  
Web: [www.fnballinger.com](http://www.fnballinger.com)  
Fax: 325/365-2132

October 18, 2012

Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, N.W.  
Washington, D.C. 20551

Office of the Comptroller of the Currency  
250 E Street, S.W.  
Mail Stop 2-3  
Washington, D.C. 20219

Robert E. Feldman  
Executive Secretary  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation,  
550 17<sup>th</sup> Street N.W.  
Washington, D.C. 2429

RE: BASEL III Capital Proposals

Ladies and Gentlemen:

Thank you for the opportunity to provide comment on the Basel III proposals that were recently issued for public comment by the Federal Reserve Board, The Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation. While BASEL III is an attempt to increase overall bank capital, it utilizes modeling tools that are much too complex for our community bank and the needs of all community banks. The calculations are a costly regulatory burden for us and would have an immediate adverse impact on our regulatory capital.

We request that you consider changes made to BASEL III that will recognize the difference between community banks and megabanks. Without this change, a huge blow would be inflicted upon community banks and the economic recovery would be severely threatened.

Sincerely,



Pam Halfmann  
Senior Vice-President/Cashier