October 25, 2012

The Honorable Ben S. Bernanke
Chairman
The Federal Reserve System
20th Street and Constitution, NW
Washington, DC 20429

The Honorable Thomas S. Curry
Comptroller
Office of the Comptroller of the Currency
250 E Street, SW
Washington, DC 20219

The Honorable Martin J. Gruenberg
Acting Chairman
Federal Deposit Insurance System
550 17th Street, NW
Washington, DC 20429

RE: Federal Reserve Docket No. R-1430; RIN No. 7100-AD87 and Docket No. R-1442; RIN No. 7100-AD87; FDIC RIN 3064-AD95, RIN 3064-AD96; OCC Docket ID OCC-2012-0008 and Docket ID OCC-2012-0009

Dear Chairman Bernanke, Comptroller Curry, and Acting Chairman Gruenberg:

I write to you to express my interest in the recent proposed rules to implement Basel III regulatory capital reforms. I appreciate your efforts to revise and strengthen capital adequacy standards for financial institutions. Properly-crafted standards will make the banking system more resilient and help deter another global financial crisis. However, I have heard from a number of smaller community banks in my district about potential unintended consequences of these proposals. With this in mind, I urge you to consider the impact of the proposed rule on smaller, less complex institutions.

As you know, in recent years the banking industry has been characterized by increased consolidation. Yet smaller local banks still play a critical role in many communities, especially in areas not served by larger banks. Their smaller asset size and scope of operations also mean that they differ from the largest banks in their business models, risk profiles, and consumer orientation. Community banks help to ensure that the economic and jobs recovery takes hold in all areas of the country.

Banking rules can promote safety and soundness while accounting for these differences. Without a vibrant community banking system, consumers will be left with fewer choices and communities and rural areas across the country could be deprived of the services on which their prosperity depends. As you work to finalize new capital adequacy standards, I urge you to craft these rules in a way that accounts for the needs of the diverse institutions in America’s financial marketplace. Thank you for your consideration.

Sincerely,

Daniel W. Lipinski
Member of Congress