November 15, 2012

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

The Honorable Marty Gruenberg
Acting Chairman
Federal Deposit Insurance Corporation
550 17 Street, NW
Washington, DC 20429

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

Dear Chairman Bernanke, Comptroller Curry and Acting Chairman Gruenberg,

We write to express our concern with the capital requirements for community banks recently proposed by your agencies. We urge you to take into consideration the unintended consequences of a “one-size-fits-all” regulatory approach to community banks.

The 2008 financial collapse highlighted the need to reform the financial system, including the need for increased capital requirements, to prevent future taxpayer bailouts of the largest financial institutions. However, in developing rules to address the issue of capital reserve deficiencies, your agencies should consider the impact on community banks of applying to them standards developed for the largest and most complex financial institutions.

Community banks are often the only institutions that provide direct service and investment to the communities they serve. These banks are the source of capital and credit for the very Main Street communities that are struggling to regain their footing following the Great Recession. Most community banks did not engage in the risky financial activities that contributed to the financial crisis and wreaked havoc on our economy. Community banks do not pose a “too-big-to-fail” threat to the global financial system and your rules should reflect that distinction.

Capital requirements should be designed in a practical way that do not unnecessarily burden the community banks your agencies carefully regulate and monitor. As you review the proposed rules, we urge you to consider the unintended consequences these changes could have on community banks and make any appropriate adjustments.
Sincerely,

PETER WELCH  
Member of Congress

MICHAEL MICHAUD  
Member of Congress

CHELI I PINGREE  
Member of Congress

JOE COURTY  
Member of Congress