



October 3, 2012

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve
System
20th Street and Constitution Avenue, NW
Washington, D.C. 20551

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

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429

Re: Basel III Capital Proposals

Dear Ladies and Gentlemen;

Thank you for the opportunity to provide comment on the Basel III proposals that were recently approved by the Federal Reserve Board, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation.

American Bank Center, Dickinson, North Dakota is a wholly owned subsidiary of American Bancor, Ltd (Holding Company). We are a banking, trust and insurance system located in the Western 2/3 of North Dakota. The bank is approximately \$1 billion in total assets. We have 19 locations throughout North Dakota. We have a rich history as an agricultural bank as well as serving our communities with small business loans and 1 – 4 family housing. We are a community focused bank. We are owned by the people who work here. We are very proud of our heritage, and plan to be here many years to come.

Capital is and has always been the driver in this industry. We exist because of it. We allocate it wisely, and we will continue to do so. We operate under a capital plan that makes sense to us. It fits our needs, and those of the communities we serve. We know that we receive our 'license' to do business because of our regulators. Yet, we are conscious enough to know that we must balance our existence between many arenas. Capital is a base in which we leverage our ability to serve our communities. Obviously, we agree that more capital would be better than less. However, it is in the wisdom of achieving that appropriate balance that we must consider the impact of being moved to a requirement that does not make a lot of fiscal sense on our balance sheet. We take great pride in running a clean, safe, sound and prudent bank, trust and insurance company.

I will not go into each and every detail of Basel III. We are always watching and asking ourselves, 'is this appropriate for our size and complexity?' It seems that treating all banks and financial institutions alike, thereby disenfranchising those who were not a part of the so called crisis is a bit unfair. Yet, when it comes to the difference in size from a larger bank to the smaller ones, then we allow the smaller ones to fail and step in to rescue the large ones only. This is inconsistent and gives an unreasonable advantage.

Ours is not to judge the motive, but rather to analyze the consequence. We respectfully request that you consider the size and complexity of an institution, before systematically deciding that all banks and financial institutions are the same.

Respectfully submitted,



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Robert Larson
President and CEO
North Country Bank
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Underwood, ND 58576

CC: Mr. Dennis Dahl, Case Manager, Federal Deposit Insurance Corporation
Mr. Robert Entringer, Commissioner, ND Department of Financial Institutions