

August 7, 2012

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

Office of the Comptroller of the  
Currency  
250 E Street, SW  
Mail Stop 2-3

Washington, DC 20219  
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

Ladies and Gentlemen:

The undersigned trade associations, representing the banks in every state in the nation and Puerto Rico, respectfully request an extension of the comment period for the Basel III proposals<sup>1</sup> that were recently approved for publication for comment by the Federal Reserve Board, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation.

Every bank in our communities would be affected by these proposals, and there is little of more importance to the management and operation of a bank than its capital and the regulations affecting capital. For that reason, every one of our *communities* would also be affected by these rules. We want to provide and need to provide you with the very best information possible to aid you in completing rules that have the best impact on our banks, the industry, as well as on local and national economies. Our members will find it difficult in the extreme to provide that kind of quality and necessary information to you by September 7, 2012. Due to the broad scope of the proposals and their applicability to all business lines across all banks, we need sufficient time to evaluate the operational complexities of the proposals and understand their significant impact for our customers.

We also note that the formal proposed rules have yet to be published in the *Federal Register*, further handicapping the ability of banks to respond to the proposals. We therefore request that the comment period on the proposed rules allow for at least 90 days of public review and comment from the date of formal publication in the *Federal Register*.

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<sup>1</sup> The proposals are titled: *Regulatory Capital Rules: Regulatory Capital, Implementation of Basel III, Minimum Regulatory Capital Ratios, Capital Adequacy, and Transition Provisions*; *Regulatory Capital Rules: Standardized Approach for Risk-weighted Assets*; *Market Discipline and Disclosure Requirements*; and *Regulatory Capital Rules: Advanced Approaches Risk-based Capital Rules; Market Risk Capital Rule*.

Sincerely,

Alabama Bankers Association  
Alaska Bankers Association  
Arizona Bankers Association  
Arkansas Bankers Association  
California Bankers Association  
Colorado Bankers Association  
Connecticut Bankers Association  
Delaware Bankers Association  
Florida Bankers Association  
Georgia Bankers Association  
Hawaii Bankers Association  
Heartland Community Bankers  
Association  
Idaho Bankers Association  
Illinois Bankers Association  
Illinois League of Financial Institutions  
Indiana Bankers Association  
Iowa Bankers Association  
Kansas Bankers Association  
Kentucky Bankers Association  
Louisiana Bankers Association  
Maine Bankers Association  
Maryland Bankers Association  
Massachusetts Bankers Association  
Michigan Bankers Association  
Minnesota Bankers Association  
Mississippi Bankers Association  
Missouri Bankers Association

Montana Bankers Association  
Nebraska Bankers Association  
Nevada Bankers Association  
New Hampshire Bankers Association  
New Jersey Bankers Association  
New Mexico Bankers Association  
New York Bankers Association  
North Carolina Bankers Association  
North Dakota Bankers Association  
Ohio Bankers League  
Oklahoma Bankers Association  
Oregon Bankers Association  
Pennsylvania Bankers Association  
Puerto Rico Bankers Association  
Rhode Island Bankers Association  
South Carolina Bankers Association  
South Dakota Bankers Association  
Tennessee Bankers Association  
Texas Bankers Association  
Utah Bankers Association  
Vermont Bankers Association  
Virginia Bankers Association  
Washington Bankers Association  
Washington Financial League  
West Virginia Bankers Association  
Wisconsin Bankers Association  
Wyoming Bankers Association