

October 1, 2013

Gary A. Kuiper, Counsel
Attn: Comments Room NYA-5046
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

RE: FFIEC 031, 041 and 101

Dear Mr. Kuiper:

The FFIEC has proposed revisions to regulatory capital components and has invited comments. Currently, FASB is reviewing a change in accounting standards that may increase the ALLL reserve that a bank would be required to hold. The Tier II capital calculation limits ALLL reserve component to 1.25%.

I would like to comment that in the event there is a structural increase in the ALLL reserve requirement, the cap of 1.25% should be raised proportionately in the calculation of capital.

Sincerely,

A handwritten signature in black ink, reading "Stewart M. Greenlee". The signature is written in a cursive, flowing style.

Stewart M Greenlee
President& CEO