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From: Darlyne Handley [mailto:dhandley@aea-bank.com]
Sent: Tuesday, January 30, 2001 9:11 PM
To: comments@fdic.gov; public.info@ots.treas.gov;
regs.comments@occ.treas.gov; regs.comments@federalreserve.gov
Cc: keul@aea-bank.com
Subject: Simplified capital rules for Non-complex Banks

Asia-Europe-Americas Bank is a Community Bank located in Seattle Washington, with assets of \$118 million. We read with interest the proposal on revising the calculation of bank capital adequacy. We support the proposal to simplify the capital framework for non-complex banks to relieve unnecessary regulatory burden.

We believe that banks under \$5 billion in assets, with a simple low-risk balance sheet should meet the definition of non-complex. For non-complex banks, calculation of the leverage ratio alone should be a sufficient measurement of bank capital.

Thank you for your efforts in this regard.

Darlyne C. Handley
Chief Financial Officer