



ESCAMBIA COUNTY BANK

P.O. Box 601 • Flomaton, Alabama 36441
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August 30, 2012

Mr. Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, D.C. 20429

Re: Comments/Legal ESS
Proposed New Capital Rules

Dear Mr. Feldman:

Escambia County Bank is a typical community bank with \$85 million in assets and a tier one leverage capital ratio of 12% and a tier one risk-weighted capital ratio of 27%+. This institution by design does not have a complex balance sheet so that more resources can be better used to profitably serve the bank's customers.

We could send pages and pages of comment about pages and pages of proposed new rules, but the main point to us seems to be this: **Why is it necessary to add more complicated and restrictive capital rules to institutions such as Escambia County Bank, when our very existence is already threatened by the onerous new burdens of Dodd-Frank and the CFPB?**

Even though our current capital would only be marginally affected at the present, these proposed rules will hamper flexibility for customer service and growth in the future. These rules are entirely unnecessary for community banks with under \$500 million in assets.

Respectfully,

James R. Jones
Chairman & President

Cc: Alabama State Banking Department
Alabama Bankers Association
American Bankers Association
Senator Richard Shelby
Representative Spencer Bachus
House Committee on Financial Services