



# Peoples Bank

*Where Values Matter!*

June 27, 2011

Mr. Gary K. Van Meter  
Acting Director  
Farm Credit Administration  
1501 Farm Credit Drive  
McLean, VA 22102-5090  
Email: [regcomm@fca.gov](mailto:regcomm@fca.gov)

RE: Margin and Capital Requirements for Covered Swap Entities  
RIN 3052-AC69

Dear Mr. Feldman:

Peoples Bank is a community bank that lends to small businesses and consumers in Iowa, South Dakota and Minnesota. Peoples Bank agrees with the views expressed by Pacific Coast Bankers' Bancshares in its June 22, 2011 letter submitted to your agency regarding the margin and capital requirements for covered swap entities

Our community bank with \$350,000,000 in assets has used interest rate swaps successfully to help our clients minimize long term interest rate risk. The swaps allow the bank to mitigate the dangers of long term interest rate risk on our bank. These products have been a win/win for us and our client. As PCBB's letter states, we at Peoples Bank would probably discontinue this product offering if the proposed changes are adopted.

Sincerely,

Joe D. Van Tol  
CEO

JVT:rp

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