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July 17, 2014

General Counsel
Legal Division
Texas Department of Banking
2601 North Lamar Boulevard, Suite 300
Austin, TX 78705-4294

RE: Proposed amendments to 7 TAC §15.4; 39 TexReg 5014

Dear Ms. Reyer:

Almost half of the members of the Independent Bankers Association of Texas ("IBAT") are state chartered banks and could be affected by the proposed change to the above referenced rule, which deals with time limit for providing required information in corporate filings. The proposal would eliminate the automatic extension of time to submit additional information and the further extension for good cause, replacing these with an extension at the sole discretion of the commissioner. No standards are provided for that discretionary extension.

Under the current rule, there is the potential for paperwork on both the applicant's and the department's side as additional information is requested by the department in order to evaluate an application and the applicant seeks additional time to respond. Corporate activities range from bank charters, changes in bank offices/branches, change of control applications, applications for merger, conversion and purchase or sale of assets, as well as charter amendments to effect certain changes in outstanding stock (such as reverse stock splits and acquisition and retention of treasury shares). Some filings may result in a request for an opinion of counsel or CPA prepared statements. Other filings are much simpler. Nonetheless, there is a need for greater flexibility for both parties to such applications.

IBAT would suggest that there are better ways to deal with the current rule and achieve the objective of reducing paperwork and creating more flexibility. One very simple step that could reduce the cost and time of the requests would be to clearly authorize the "written" communications to be achieved electronically.

Next, we recommend that the 60 days for submitting additional information be triggered by the request for the additional information rather than from the date of initial submission. That amount of time will not always be needed for the follow-up data, but it should generally be more than adequate for most requests. Thus, the need for an extension should be eliminated in the vast majority of the cases.

Texas Department of Banking

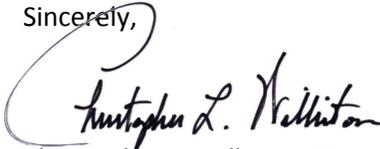
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Finally, rather than making the extension at the sole discretion of the commissioner, the extension should be based on a showing by the applicant of "good and sufficient cause." This language is in the current rule. Thus, presumably the department already has experience with sifting frivolous requests from reasonable ones.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Christopher L. Williston". The signature is written in a cursive style with a large, looping initial "C" that extends to the left and underlines the word "Christopher".

Christopher L. Williston, CAE
President and CEO

CLW/bjk