

June 03, 2010

Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Dear Sir or Madam:

The Conference of State Bank Supervisors (CSBS) appreciates the opportunity to comment on the Federal Deposit Insurance Corporation's (FDIC) proposed templates for safe, low-cost transactional and basic savings accounts for low and moderate income consumers. CSBS strongly supports efforts to help and protect consumers, including the under-banked. However, it is important that FDIC's proposed templates for financial institutions be beneficial for both the institution and the consumer.

In examining the proposed templates for safe, low-cost transactional and basic savings accounts, it seems quite possible that the proposed templates will promote a line of business for which it is very difficult to achieve a profit. CSBS believes the templates will achieve greater adoption and bring more people into the banking system if institutions are provided a model to ensure these products are reasonably profitable. We do not believe offering these accounts as some type of "loss leader" is practical or realistic. We strongly encourage the FDIC to work with the industry and academia to gather additional information and conduct further research on the methods by which financial institutions can implement the low cost transactional and basic savings accounts without incurring perpetual losses.

Best Regards,

A handwritten signature in black ink, appearing to read "Neil Milner". The signature is written in a cursive, flowing style.

Neil Milner President and CEO