

March 21, 2011

Federal Depositors Insurance Corporation  
550 17<sup>th</sup> Street NW  
Washington, DC 20429-9990

Re: FIL -6-2011: Part 330 – Deposit Insurance Education

To Whom It May Concern,

SpiritBank appreciates the opportunity to comment on the Federal Deposit Insurance Board's proposed rulemaking that would require training of IDI employees on FDIC deposit coverage.

The first critical point is this is another government band-aid. Rather than addressing the complexity of the FDIC rules and working to make the rules simpler for the consumer they are placing the burden once again on the IDI's to prove that they are using EDIE and the brochure.

If the Goal is to reduce consumer calls and confusion, the answer is to make the FDIC rules easier. What are the most frequently asked consumer questions? We only have to look at the FDIC website to get our answer. The consumer must take a course in Account Styling in order to understand the factors that drive the coverage. Based on the FDIC's Website, Frequently Asked Question Guide and the EDIE tutorial the questions regarding FDIC coverage are mostly about how to style the account to get the coverage. As stated in the rule, those are THE QUESTIONS on which the FDIC does not want bank employees to give advice. This new training requirement will do nothing to reduce confusion and calls from the consumer because the consumer will still be calling to attempt to understand the coverage that is based on the complexity of account styling.

Secondly, our documented first step in the account opening process is to search our database for a current relationship. This is not a new concept especially since our compliance with other regulations requires us to **know with whom we are doing business**; BSA/USA Patriot Act/CIP/Red Flag etc. This rule confirms that the FDIC is not at all aware of other Account Opening Guidelines placed upon us by other government agencies.

Finally, Telling is not Training. The transfer of knowledge only occurs in the real world with observation and feedback that only the IDI Supervisors and Training staff can provide. An additional training requirement mandated by an agency in Washington is not a training plan. We can measure the desired training outcomes of the employee. Who measures the desired training outcomes of the consumer?

Thank you,

Teresa Ward  
Training Director  
SpiritBank