

April 6, 2011

Mr. Robert E. Feldman Executive Secretary Attn: Comments Federal Deposit Insurance Corporation 550 17<sup>th</sup> Street, NW Washington, D.C. 20429

Re: RIN # 3064-AD37

Dear Mr. Feldman,

Flagstar Bank, FSB (Flagstar) appreciates the opportunity to comment on this proposed rule. Flagstar is a subsidiary of Flagstar Bancorp, a bank holding company headquartered in Troy, Michigan, with \$13.6 billion in total assets. Flagstar is the largest publicly held savings bank headquartered in the Midwest. At December 31, 2010, Flagstar operated 162 banking centers in Michigan, Indiana and Georgia and 27 home loan centers in 13 states. Flagstar originates loans nationwide and is one of the leading originators of residential mortgage loans. Flagstar had over 280,000 retail deposit accounts, including checking, savings, money market and CD accounts, representing approximately \$5.4 billion in retail deposits at year-end 2010

We certainly agree that improved access to accurate information about FDIC insurance coverage will promote public confidence in federal deposit insurance. We also agree that training for those employees that interact with customers during the account opening process is important and will aid in promoting public confidence. We currently require our "front line" employees to receive training, regarding FDIC insurance, but believe that standard training provided by the FDIC would be beneficial.

We do have a concern about the requirement to provide the FDIC's publication, Deposit Insurance Summary, only in those instances when a customer, opening an account, informs the employee that he/she will have funds in excess of the standard maximum deposit insurance amount once the new account is opened. Flagstar believes that it would be more beneficial to have the publication readily available in bank branches to enable any customer – new or existing – to take a copy. This approach would ensure that the brochure was available to customers without the additional burden of requiring branch employees to ask the customer about his/her accounts and then document that the question was asked and answered and that, depending upon the answer given, a copy of the publication was provided.

If you have any questions or would like any additional information, please contact me at 248-312-5007 or **Michele.K.Spear@flagstar.com**.

Sincerely,

Michele K. Spear Chief Compliance Officer