

From: Drew Lindsey [DLindsey@bankatfsb.com]
Sent: Thursday, September 23, 2010 4:31 PM
To: Overdraft Comments
Subject: FIL-47-2010 Comments

Federal Deposit Insurance Corporation
550 17th Street NW
Washington, D.C. 20429-9990

RE: FIL-47-2010

Dear Sir or Madam:

I work at a \$117 million dollar bank that has been in this community for over fifty (50) years. We employ 47 people and serve the banking needs of many people and businesses in our small community. We retain our customers because of the customer service we provide them. If they felt as though we were taking advantage of them, we would certainly no longer be their banker.

The six (6) overdrafts, in a rolling 12-month period, requirement is an arbitrary number that is counter to existing Reg. DD requirements that require us to provide overdraft information to our customers on a year to date basis. Is there any way the FDIC can introduce the notion of discretion in the monitoring of the six (6) overdrafts in a rolling 12 month period requirement?

Will all FDIC examiners have the same definition of “appropriate daily limits on customer costs?” If this is the direction that the FDIC takes, it should clearly define “appropriate daily limits.”

Again, the majority of our customers make sound financial decisions and, for those who do not, we already work with/counsel them to get them into the product that best fits their financial needs.

Thank you for providing me with the opportunity to comment on this matter and I hope the FDIC will reconsider the promulgation of this guidance.

Sincerely,

Drew Lindsey
Assistant Vice President
First State Bank
Clute • Lake Jackson • Manvel
Phone: 979.299.6868 • Fax: 979.299.6638
dlindsey@bankatfsb.com

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