



First State Bank  
Central Texas

*Still First!*

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KEVIN K. VIRDELL  
Branch President

September 23, 2010

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

Dear Sirs:

I work at First State Bank Central Texas, a \$1 Billion organization in the central part of Texas. We employ over 250 people and provide banking services in 11 counties and 25 communities. We retain our customers because of the prompt, friendly customer service we provide them. We feel like the proposal of six overdrafts in a rolling 12-month period 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.

We question whether there is any way the FDIC can introduce the notion of discretion in the monitoring of overdrafts over a rolling 12-month period requirement. In many instances we would rather pay the customer into an overdraft position, rather than returning the check. In essence, your proposal will increase the costs to our customer with double charges on returned checks.

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

I believe your proposal is counter-productive in serving our customer needs and desires.

Sincerely,

Kevin K. Virdell  
President

MEMBER FDIC

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