

From: duane.muecke@iowastatebank.net [<mailto:duane.muecke@iowastatebank.net>]  
Sent: Monday, September 27, 2010 9:18 AM  
To: Comments  
Subject: FDIC Proposed Guidance on Overdraft Coverage

Duane Muecke  
105 Albany Ave SE  
Orange City, IA 51041-1773

September 27, 2010

Comments to FDIC

Dear Comments to FDIC:

By electronic delivery to:  
[OverdraftComments@fdic.gov](mailto:OverdraftComments@fdic.gov)

Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429-9990

Re: Overdraft Payment Supervisory Guidance, FIL-47-2010, August 11, 2010

Dear Sir or Madame:

We are a small Midwestern bank in Sioux County and have had to jump through many regulatory hoops lately. This process has become quite time consuming and costly to say the least. We operate our bank to serve our customers but we also MUST make a profit so we CAN serve our customers. We do this by charging our customers fairly for the services we provide and offering free services to them as well. If we overcharge there is plenty of competition for our customers to make alternative choices. That's the American way. We surely do not need more rules and regulations.

I strongly oppose the FDIC's proposed guidance (FIL-47-2010) that addresses overdraft coverage programs. Simply put now is not the time to introduce further regulation targeted at overdraft coverage products. My bank has just implemented new requirements under Regulation DD (Truth in Savings) and Regulation E (Electronic Fund Transfers) at great expense and manpower. Having to rework our bank's deposit products and to accommodate a regulatory moving target does not help my bank serve its customers.

My bank does not manipulate transaction processing to generate more fees and higher revenue. My bank is accountable to its community and its success is dependent on a mutually beneficially relationship with customers. If we engaged in "price-gouging" tactics, we COULD NOT do business in our community.

Please reconsider your proposal and let the free market take its course and stop over regulating things like this.

I urge the FDIC to carefully consider this measure to ensure that the guidance does not impede my bank's ability to provide overdraft coverage services to my customers. If we are forced to abandon or significantly alter these services due to regulatory burden, the result could lead more consumers into

becoming unbanked or relying on other products such as prepaid debit cards and check cashing services, which have higher fees and foster unsound financial practices.

Sincerely,

Duane Muecke