

To: FDIC
Re: Safe Account Template Comments

We have a small community bank in Arkansas, and like every bank I know, we are more interested in banking the unbanked than any consumer protector or activist, politician, regulator, or lobbyist. Fighting for customers is what we do every day. We offer a smorgasbord of free services and incentives to attract the unbanked. We've found that there are those who, for whatever reason, do not want to use the services of a bank no matter how beneficial it would be to them. I think it's safe to say that no "significant opportunities" exist for providing basic products and services to LMI consumers.

For example, the free services we offer now include:

FREE ATM/Debit cards

FREE Online Banking

FREE Printable images of both the front and the back of all your cleared checks via online banking

FREE Online Bill Pay

FREE Direct Deposit

FREE 24 hour account information by telephone via our voice response system

FREE Email statements

FREE Mailed statements

There is no minimum balance requirement and no limit on the number of checks the customer can write and no monthly fee.

We offer \$20 referral rewards, we offer a \$20 reward for every direct deposit they set up and a \$5 reward for every recurring electronic debit when it is set up.

I think the free market has out-stripped any proposed template that can be created. Competition and free enterprise really do work. Consumer free will is alive and well. As far as I know, most banks offer similar free services.

Regarding educational opportunities, experience has shown monumental resistance to any attempt to provide seminars, workshops, or written material that would help people manage their money. High school and college students will listen if they are required to, but otherwise people aren't interested or are too busy. Attempts to offer educational resources are frustrating and futile.

The vast majority of bankers are good people who work very hard to win business and treat customers right. Our survival depends on our reputations, which we work hard to sustain. We are suffering from an onslaught of well-intentioned but mis-guided rules and regulations. For us to remain safe and strong, we need some relief and our time needs to be freed up to get back to the business of taking very good care of our customers.

You may not receive a lot of comments from bankers, as these are challenging, busy times for us and there are some other urgent matters we are attending to. But I do think that my comments would be agreed with by the vast majority of bankers in the trenches who may not have the luxury of being able to voice their opinions.

Thank you for the opportunity to comment.

Sincerely,

Mary Fowler, CEO
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