



BANK OF COMMERCE

September 20, 2010

Delivered via email: overdraftcomments@fdic.gov

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 \$19MM community bank that has been in the area for over 10 years. We serve the banking needs of approximately 433 people in this area and 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 majority of our customers make sound financial decisions. For those who do not, we provide counsel to get them into a product that best suits their banking needs.

In regards to the six overdrafts in a rolling 12-month period requirement, I feel that it counters existing Reg. DD requirements that require overdraft information disclosure on a year-to-date basis. Will all FDIC examiners have the same definition of "appropriate daily limits on customer costs"? If this is the direction in which the FDIC is moving, a clear definition of "appropriate daily limits" is necessary.

I appreciate the opportunity to comment on this matter and hope that the FDIC will reconsider this guidance.

Sincerely,

Alex O'Brien
President
Bank of Commerce

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