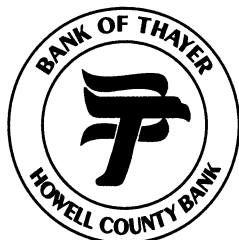


BANK OF THAYER

116 Chestnut Street
P. O. Box 35
Thayer, MO 65791
417-264-7217
fax 417-264-7240



Member FDIC
www.bankofthayer.com

HOWELL COUNTY BANK

960 Preacher Roe Blvd.
P. O. Box 468
West Plains, MO 65775
417-257-0077
fax 417-257-1502

September 11, 2010

Federal Deposit Insurance Corporation

via OverdraftComments@fdic.gov

RE: FDIC FIL-47-2010 dated August 11, 2010 "Overdraft Payment Supervisory Guidance"

The Bank of Thayer appreciates the opportunity to comment on guidance referenced above. It is our opinion that the proposed guidance goes beyond what has traditionally been provided through interagency guidance imposing expectations that are not currently required by law or regulation. Additionally, if the FDIC pursues the adoption of this guidance without Interagency support we will be placed at a competitive disadvantage with national banks.

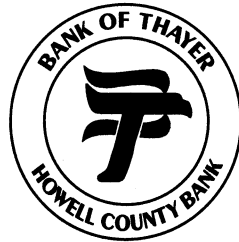
Moreover, the guidance is directed at a program that our customers like. We have always offered customers the ability to opt out of the entire program at any time and more recently the rights to opt out of the program for debit cards and ATM transactions but few have done so. Customers appreciate not having the embarrassment of having a transaction returned and appreciate not receiving returned check charges from merchants in addition to NSF fees imposed by the bank as a result of overdrawing their account by check. We recently asked for input from our customers regarding their experiences with the program – all responses are attached. Note there was not one response complaining about the program.

The guidance states that the FDIC expects financial institutions to promptly honor customer requests to decline coverage resulting from non-electronic transactions. We have offered this right to customers as long as we have offered an overdraft program. The percentage of our customers who have opted out is well short of 1 percent. Why would a customer opt out when if they overdraw their account by check they will receive an NSF fee equal to an overdraft fee in addition to merchant returned check fees, embarrassment and potential legal action.

The FDIC expects banks to give consumers the opportunity to affirmatively choose the overdraft payment product that meets their needs. We have always offered customers the ability to set up automated transfers from savings or other deposit accounts to cover overdrafts and prevent charges. In the past, we offered overdraft lines of credit but we have discontinued offering this product. We have found the loss history of this product to be such that it is not profitable or practical for the bank to offer. I suspect that the majority of customers utilizing the overdraft product today will not qualify for personal lines of credit under normal and regulatory expected underwriting criteria.

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The FDIC expects financial institutions to monitor accounts and take meaningful and effective action to limit use by customers as a form of short-term, high-cost credit, including, for example, giving customers who overdraw their accounts on more than six occasions where a fee is charged in a rolling twelve-month period a reasonable opportunity to choose a less costly alternative and decide whether to continue with fee-based overdraft coverage. Customers currently receive daily notices after each overdraft as well as several notices throughout the month and phone calls if they are not able to catch the accounts up. Within the customer notices, we encourage the customer to call the bank to discuss a more affordable method of managing their finances. Customers are also provided all of the disclosures currently recommended by guidance.

The FDIC expects financial institutions to institute appropriate daily limits on overdraft fees and not process transactions in a manner designed to maximize costs to the consumer. I am proud to say that Bank of Thayer has instituted an appropriate daily limit and processes transactions in the order in which they are received and not in a way to maximize costs to the consumer. I think it is important to differentiate between the banks which have processed transactions to increase costs to the consumer and those like our bank that have not because we don't believe that is an ethical approach or good customer service. We, and probably many banks, have incorporated the practices outlined in the 2005 Joint Guidance on Overdraft Protection Programs.

Finally, I would like to point out that if we are limited in charging 6 overdraft fees per year we will approve far fewer overdrafts resulting in NSF charges for consumers coupled with merchant returned check fees. I don't see how this helps the consumer. The bank will be forced to return most items over 6 per year because it cannot bear the risk of paying accounts into overdraft without the fees that offset this risk. Furthermore, the customer would still be charged an NSF fee if the check is returned, a merchant returned check fee and potential legal and credit issues as a result of the returned check.

Thank you for your time and consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Courter", with a long, sweeping horizontal line extending to the right.

Adam Courter
Executive Vice President
Bank of Thayer

My name is Marilyn L. Wilson

I am a customer of Bank of Thayer.

I live in Heshkong, Mo. (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

Has helped us out from pay check to pay checks
to either pay bills or put food on the table.

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Marilyn L. Wilson
Signature

My name is Charles Moore

I am a customer of Bank of Thayer.

I live in Myrtle, MO (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

- 1) Overdraft Program helps us to meet emergency obligations
- 2) It has helped us when we didn't know our account balance was low

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Charles Moore
Signature

My name is Betty Mahan

I am a customer of Bank of Thayer.

I live in Altam, MO. (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

Food, Propane, Gasoline, Medical
Bills, Medicines - Electricity, Insurance -
Repairs on my Car -

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us - not to put us at financial risk!

Betty Mahan
Signature

Keep your nose
out of our Banking
Business - And
Hands off of our
money !!

My name is Michael D. Peratta

I am a customer of Bank of Thayer.

I live in ALTON. MO (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

pay for High Cost of GASOLINE
High Cost of groceries
High Cost of PROPANE
Keep Your HANDS OFF!!!

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Michael D. Peratta
Signature

My name is Tommy Jackson

I am a customer of Bank of Thayer.

I live in West Plains MO (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.


Our use of the overdraft program has helped us in these ways:

Helps protect our good credit

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!


Signature

My name is Eleanna Mott

I am a customer of Bank of Thayer.

I live in West Plains, Missouri (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

It has helped me keep my insurance
coverage when there wasn't enough money
in the bank to cover the check. This saved
me a lot in not having to pay reinstatement fees.

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Eleanna Mott.
Signature

My name is DONALD W. TABOR

I am a customer of Bank of Thayer.

I live in THAYER, MO (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

IT IS A CUSHION FOR SMALL
EMERGENCIES. I USE IT WHEN NEEDED.
THE FEE IS NOT EXORBITANT.
PLEASE...NO GOV. INTERFERENCE

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Donald W. Tabor
Signature

My name is ANTONIO NETTLES & MARTINA LORENZO

I am a customer of Bank of Thayer.

I live in ALTON, MISSOURI (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

WE HAVE BEEN ABLE TO PUT GAS IN OUR CAR TO DRIVE
TO W. PLAINS FOR MEDICAL TREATMENT, BUY SCHOOL
SUPPLIES AND CLOTHES FOR OUR DAUGHTER, AND PAY
FOR UNEXPECTED THINGS (A LARGE VET BILL FOR EXAMPLE).

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Antonio Nettles
Signature

Martina Lorenzo

My name is Camellia Jean Lucas-Hanson

I am a customer of Bank of Thayer.

I live in West Plains, Mo. (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

I work for the federal govt' as you Senator's
know and quite frankly overdraft has helped
my family in economic crisis now in this
recession. I have made my reports to the house
+ taking it away is absurd. You guys get your
Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Camellia Jean Lucas Hanson
Signature

Automatic pay raises we military don't. It's
times you stop the nonsense and straighten out
this mess.

My name is Kimberly Barton

I am a customer of Bank of Thayer.

I live in West Plains, MO (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

Food for my child, a vehicle to get back
and forth to work so I can make a living,
making sure my daughter has a roof over
her head! the stress relief knowing my home
town bank has been there to help just to get
Don't throw our needs under the bus! to the next pay day.

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Kimberly Barton
Signature

My name is Clara Sue Daves

I am a customer of Bank of Thayer.

I live in Thayer MO (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

overdraft has helped my family get back on our feet,
also it has helped me pay my electric, buy food
for me and my children it also has helped me get
to the doctors because I have a lot of problems
and fighting for my disability my husband is working
Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us - not to put us at financial risk!

Clara Daves
Signature

Really hard to support us. I pray to god things
will change for us. My husband works really
hard and pays taxes and I thank God
Every Day for him and for you for
helping us. I hope thing will be alot
Better for Christmas for my children
may God Bless you
Sincerely Clara Daves

My name is Kathy Judd

I am a customer of Bank of Thayer.

I live in West Plains, MO (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

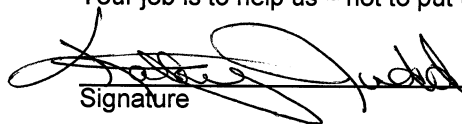
Gas for doctors Prescription Co-Pays Groceries

lots of different ways

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!


Signature

My name is William T. Long

I am a customer of Bank of Thayer.

I live in Thayer, Mo. (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

Allowing myself extra Fund wend needed at a very small fee.

Emergency medical + prescriptions

extra food if needed

paying shut-off notices when needed

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

William T. Long
Signature

Don't you people have enough power without trying to control how we do our banking. We make our own personal choices, the banks don't make them. Why do you feel you should. Who elected you! Don't try to be "big brother". Do you think that we live in "Cold War" Russia? How would you feel if we made choices for you in your personal everyday life.

Thank you.

William T. Long

My name is Leonard Welch

I am a customer of Bank of Thayer.

I live in West Plains MO (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

we have been short on cash at the end of
each month so the over draft program has
help us to keep our bills paid up until
we get on our feet Tanks

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Leonard Welch
Signature

My name is ANITA CALDWELL

I am a customer of Bank of Thayer.

I live in KOSHKONONG, MISSOURI - RT. 2 - 65692 (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

When I need to borrow money, the Bank
allows me that privilege as long as I repay
each 30 days. I consider overdraft fees
fair, to use the Bank's money. This service
is gratefully needed and appreciated.

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Anita Caldwell

Signature

My name is Judy Hardin

I am a customer of Bank of Thayer.

I live in Hartford, Arkansas (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

paying bills when due -
unexpected emergencies - sometimes
basic necessities would be hard to take
care of without the cushion of knowing I
had this protection

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us - not to put us at financial risk!

Judy E. Hardin
Signature

My name is Bonnie Holloway

I am a customer of Bank of Thayer.

I live in Rosa mo 65637 (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

when me or my husband needs gas in the
middle of a pay period or when ^{we} ~~we~~ need groceries
for home or if we have to make emergency

trips when family members are hospitalized or when
me or my husband need meds when sick, or when I make a
Don't throw our needs under the bus! mistake in the figing ~~in my~~ ^{in my} check book

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Bonnie Holloway
Signature

My name is MARY LOU HUFFMAN

I am a customer of Bank of Thayer.

I live in WEST PLAINS, MO. (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

Keep our electric on, pay our phone so my
husbands Dr's. car keep up. Allowed me to
keep minimal amounts of food on table
gas for car, house payments to keep our house,

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us - not to put us at financial risk!

Mary L. Huffman
Signature

My Husband was injured 1/18/2007 - We went from \$80,000.00 income to \$20,000.00 workmens comp until Aug 14, 2008 - Pension of 1405.00 per month (military). My husband has not been able nor I to find work in our community. As of Dec 9, 2009 my husband found a job in another state and we now are forced to live separate from one another to survive. Paying \$25.00 per transaction was expensive but we did survive. Six O.D. per year would have done me no good.

My name is William OTTAWAY MARTIN

I am a customer of Bank of Thayer.

I live in CANFIELD MO (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

IT ALLOWS ME TO ENJOY SOME ENTERTAINMENT

THROUGHOUT THE MONTH I AM VERY LIMITED ON MY INCOME

AND IT IS GETTING HARDER TO MAKE ENDS MEET, AS I GET

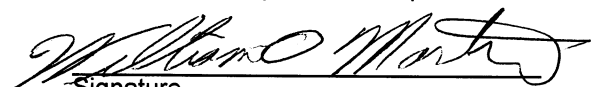
OLDER THE BANK HELPS ME TO LIVE WITHOUT STAYING HOME ALL

THE TIME - AND DIE. WITH COSTS GOING UP ALL THE TIME

DON'T THROW OUR NEEDS UNDER THE BUS! AND YOU GUYS TRYING TO TAKE WHAT
LITTLE WE HAVE.

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us - not to put us at financial risk!


Signature

AT LEAST THE BANK UNDERSTANDS
OUR NEEDS AND WE ARE NOT COMPLAINING
I THINK YOU SHOULD KEEP OUT OF THIS
LITTLE HELP WE ARE GETTING

My name is Leonard Welch

I am a customer of Bank of Thayer.

I live in WEST plains mo. 65775 (city/state)

My family has benefited from an overdraft program.
We are tax paying citizens.

Our use of the overdraft program has helped us in these ways:

IT HELPS ME TO PAY BILLS SOME TIME

WHEN I GET INTO A HARD PLACE

Don't throw our needs under the bus!

We need to have an overdraft solution that helps us in these difficult times.

Your job is to help us – not to put us at financial risk!

Leonard Welch
Signature