



September 21, 2010

Federal Deposit Insurance Corporation  
550 17th Street NW  
Washington, D.C. 20429-9990

DELIVERED VIA E-MAIL:  
OverdraftComments@fdic.gov

Re: FIL-47-2010

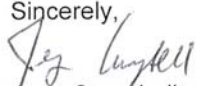
Dear Sir or Madam:

I am writing today as an officer of Town and Country Bank in Stephenville, Texas that was founded in 1977 as and remains today an Independent Community Main Street Bank. We employ 65 bankers to deliver quality service to our approximately 12,000 customers. Many of our customers are blue collar and small business type people that make good business decisions. Those that have trouble are counseled and assisted to help ensure they have financial options.

I feel that the FDIC proposal for the six overdrafts, in a rolling 12 month period requirement is an arbitrary number that is counter to existing Reg. DD requirement that require banks to provide overdraft information to customers on a year to date basis. The real beneficiary with this proposal is the software programmers that will pass along higher than normal fees due to the shorten time period to get these new requirements completed. Are consumers ready for addition disclosures and description of how to track this rolling 12 month period?

If this proposal is approved, will all FDIC examiners have the same definition of "appropriate daily limits on customer costs"? How can this be effective in different markets in different parts of the country when competition is so diverse? If this is the direction of the FDIC, a clear definition of "appropriate daily limits" is needed. The diversity of examiners and attitude during any given visit causes bankers to be concerned if interpretation is open too much.

I appreciate your providing me with the opportunity to comment on this matter and I hope the FDIC will reconsider the promulgation of this guidance.

Sincerely,  
  
Jerry Campbell  
Senior Vice President



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