



Sam W. Baker
President

September 23, 2010

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

Re: FIL – 47-2010

Dear Sir or Madam:

I serve as president and CEO of First Bank of Conroe. My banking career spans in excess of 34 years and our bank recently celebrated its 25th anniversary in Conroe. We employ approximately 125 employees. We are a “true” community bank and have an in-depth understanding of our customers and their banking needs.

Our bank has grown at a steady pace and we retain our clients due to a high quality of customer service. Make no mistake, we have never been about better than market interest rates or fees – we are about service.

Six overdrafts in a rolling 12 month period is unrealistic. It has always been our policy to counsel our customers when they have repeated overdrafts, but the number of times someone overdraws their account is predicated in their need to do so, not some arbitrary number pulled from the air.

We introduce our customers to alternative products when it makes sense, but more often than not, people overdrawing their account(s) on a regular basis do not qualify for credit cards and certainly do not have savings accounts from which to sweep funds.

It has not nor will it ever be our intention to take advantage of our customers, especially those in dire circumstances. In fact, we often grant loans to those who don't qualify at one of the “big banks” simply because we are in a position to help.

Regulating the number of overdrafts that a bank may charge for is tantamount to nationalizing our business and will undermine competition in the free market place. Our discretion to sometimes waive or refund charges has actually brought us new customers who left the “big banks” because they refused to exercise leniency.

I sincerely appreciate your consideration in this matter.

Yours truly,

A handwritten signature in blue ink, appearing to read 'Sam W. Baker', followed by a horizontal line.

Sam W. Baker
President / CEO