



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

Re: Overdraft Payment Programs and Consumer Protection, FIL-47-2010

Ladies and Gentleman,

The Louisiana Bankers Association appreciates the opportunity to comment on the above referenced item. The Louisiana Bankers Association is the sole banking association in Louisiana, representing the states' banks and thrifts.

We believe that many of the statements of supervisory expectation included in the financial institution letter impose new regulatory requirements that will impose significant new costs and burdens with little or no customer benefit. We strongly recommend that the FDIC refrain from imposing these requirements at this time when the state of overdraft programs and customer experience with them is unknown. Moreover, if and when compliance gaps do become apparent, we urge the FDIC work with the other banking agencies to draft interagency guidance to address them, replacing the 2005 Interagency Guidance with new guidance that integrates the changes to Regulations E and DD. Having one clear statement of supervisory expectation rather than individual agency pronouncements layered on top of the amended regulations and the 2005 Interagency Guidance will promote clarity and consistency, ensuring much better consumer protection than can be provided by an inconsistent patchwork of individual agency mandates.

Louisiana banks and thrifts are about at their limit in complying with existing regulations and preparing their staff and budgets for the coming onslaught of new regulations. Please reconsider this proposal.

Sincerely,

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Louisiana Bankers Association
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The mission of the LBA is to help banks grow and prosper.