

From: Gary Propheter [mailto:gpropheter@beobank.com]
Sent: Wednesday, February 16, 2011 5:46 PM
To: Comments
Subject: Proposed Rule - Rin 3064-AD37

Comments on Rule Requiring FDIC Insurance Training for Front Line Staff

When I read the proposed rule making announcement I could hardly believe my eyes! What bank does not already train its deposit taking staff on FDIC limits and EDIE? In the past three years how many different changes to FDIC insurance limits, inclusions, and exclusions have been promulgated, each requiring new sets of posted notices, mailings to affected customers, and TRAINING of front line staff?

This proposed rule change seems like another attempt to teach that small group of customers who don't read, don't listen, or don't care about FDIC insurance limits until the chips are on the line and their deposits are at risk. I know from personal experience that customers of all backgrounds, and with varying amounts of funds, are VERY aware of FDIC insurance limits, ask the right questions, and we work with them to structure their accounts accordingly. Though EDIE is well designed, the definitions of ownership types can be confusing and complex, and we would not allow just any front line staff to handle complex FDIC insurance questions, rather we call on one of our experts for this purpose.

Adding a new RULE governing the training of front line staff on FDIC insurance, making banks maintain yet another set of formal training records, all for something we already do as a matter of course is a total waste of time and money, yours and ours.

If the FDIC is so worried about FDIC insurance knowledge, why not simply beef up the Compliance Examination manual and requirements, and ask questions about handling customer inquiries about FDIC insurance and using EDIE? Anything else is non-productive.

Gary Propheter
EVP & Chief Operations Officer
Bank of Eastern Oregon
PO Box 39
Heppner, OR 97836