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Sent: Thursday, March 03, 2011 11:46 AM
To: Comments
Subject: Proposed Rule - Rin 3064-AD37

Thank you for considering these comments from Perkins State Bank, a small community bank in rural Florida.

Section III, Request for Comments

1. Right balance? Nearly the right balance. The training sessions sound long. Since consumers also have access to EDIE, we suggest the training session be only an hour long course.
2. Appropriate? Banks authorize certain employees to open New Accounts and provide customer service. More and more, customer-contact employees are cross-trained to provide full service. Mandating that all branch employees take the extensive course, just in case they might ever be involved in a discussion of insurance, is likely to have little value. Little information is retained when it is not relevant to an employee's job. Making sure all employees know where to access EDIE is probably of more value. Maybe a short training for non-deposit reps would be sufficient.
3. Ask about other deposit accounts? A bank already knows all of that customer's relationships and account balances. To ask the customer to recall all account information would only make the banker look foolish. It might make the customer look foolish, too. This is a terrible idea. Discussing deposit insurance for those with higher aggregate balances is appropriate, and is done in the course of providing good customer service. Customers who need to review the insurance protections should feel free to contact the bank or FDIC for more information.
4. Dedicated lobby resource? Over the last decade, most banks have already tried a computer in the lobby to offer customers access to their website and EDIE. I would suspect that most were removed for a variety of reasons. It is far more valuable to review deposit insurance with a customer service rep, in a private area, aided by a computer operated by the customer service rep.
5. Deposit Insurance Summary available? Good idea. We have always provided FDIC insurance booklets in our lobbies. Customers rarely take them or read them. We find our customers prefer to speak with a customer service rep.
6. CBI training records? Yes, we need administrative reports to confirm compliance.

Thank you for this opportunity to comment.

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3/3/2011