

March 28, 2011

Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

re: RIN #3064-AD37

Dear Sir/Madam:

The Alta Vista State Bank would like to comment on the proposal to require, among other things, FDIC provided training of FDIC insurance fundamentals.

First, why would this requirement promote additional public confidence in Federal deposit insurance? The FDIC logo decals placed throughout an FDIC insured financial institution already alert the public that deposits are FDIC insured. If you didn't have those at your bank, people would take note and go elsewhere with their deposits. We must place the official FDIC logo in all of our media ads as well, so why does the FDIC not place ads on publicly viewed media including television and the internet that would promote the insurance coverage? If you don't think it would work, just look at the effectiveness of the consumer directed insurance industry ads on television on a regular basis.

With regards to the training requirement, a small community bank such as ours provides training to the appropriate employees. Additional training would seem to be burdensome and redundant.

The requirement to implement procedures that would have account opening personnel inquire whether a customer has an ownership interest in any other accounts at the same insured depository institution is totally unnecessary. The advantage of placing deposit accounts in a community bank such as ours is the fact that the customers are known by the employees and to ask an existing customer, especially a long term customer, whether they have other accounts at a the same bank would insult the customer to the point they may leave your bank and consider other options.

Consumers are aware of the \$250,000 level of FDIC insurance. Giving them a copy of FDIC publications such as *Deposit Insurance Summary upon request* should be adequate. In the usual course of business, depositors approaching the \$250,000 plateau inquire about their options and at our bank we discuss their options with them person-to-person and give them a copy of a related FDIC publication *Your Insured Deposit*.

As far as requiring institutions with websites to have a link to "EDIE", this is the part of this proposed rule that makes the most sense. "EDIE" is a very good tool that probably should be used more than it is currently.

Thank you for letting Alta Vista State Bank comment on this proposal.

Sincerely,

  
Elizabeth Moyer  
President