



PONY EXPRESS COMMUNITY BANK

MEMBER FDIC

September 1, 2010

Federal Deposit Insurance Corporation
OverdraftComments@FDIC.gov
Fax: 703-465-4303

Re: FIL-47-2010

Dear Sir or Madam:

Thank you for this opportunity to comment on the proposed regulatory guidance relating to overdrafts. After reading and considering your proposed guidance, I have a few, simple comments for your consideration.

Most banks offer a wide range of products and services intended to assist consumers in managing their accounts including internet banking, text alerts, telephone services, etc. Regardless of the information and technology within the consumers' reach, it remains important that consumers act responsibly by maintaining a check register, balancing their monthly statements, and – most importantly – not spending more than they earn.

Overdraft fees are a penalty. And, as with most discipline, the penalty hurts a bit. The sting of an overdraft fee is intended to cause a second thought toward improving personal financial habits and not repeating old habits. Transferring the responsibility and expense of managing checking accounts to the bank will only lead to more consumers acting irresponsibly, failing to keep adequate records, and spending more than they earn.

Finally, my experience and observation is that most consumers who habitually overdraw their accounts do not have balances in savings accounts from which to transfer and do not qualify for overdraft lines of credit. Our bank previously offered a small dollar loan program and discontinued the program due to excessive delinquency and collection problems. So, I'm not sure what my staff will be able to offer these consumers when they contact and counsel them.

Thank you, again, for allowing me to comment. I encourage you to re-think your expectations of financial institutions as to consumers who frequently overdraw their accounts.

Sincerely,

Linda D. Means
Vice President – Branch Manager