

**From:** Pete Butcher [WButcher@wiltown.com]  
**Sent:** Wednesday, September 08, 2010 10:34 AM  
**To:** Overdraft Comments  
**Subject:** Proposal Overdraft Payment Supervisory Guidance

Please find attached my comments as per the proposal.

Thank you,

W.R. "Pete" Butcher  
President & C.E.O.  
Williamstown Bank, Inc.  
304-375-6262

**Attachment:**

COMMENTS

FDIC Bulletin: Proposal- Overdraft Payment Supervisory Guidance

I have just read the proposal referenced above and must say I am totally dismayed with the fact that the FDIC suggests we offer overdraft customers a less costly alternative such as a reasonably priced line of credit or a safe and affordable small dollar loan.

When does it come into play that the account holder should be responsible for overdrafts on their checking account. I believe every customer that has a checking account understands the fact that they can and should only write checks for which they have enough money to cover in their account. All customers are given this information upon opening their deposit account and sign new account cards and disclosures stating that they are aware of this.

Generally people who have constant overdrafts on their account would most likely not qualify for any of the lending products you suggest.

Another fact the FDIC and other regulators do not consider is what if all banks decided not to pay overdraft transactions. There would still be overdrafts fees to the customer based upon the number of items being returned. Additionally most of these items being returned will come back through the system again and they may be charged additional fees for the second return. Then when the payee of the check contacts the customer to pick up the bad check they are charged a bad check fee close to what the bank already charged. How does this help the consumer? I bet the consumer would rather just pay the bank once and have the overdraft paid.

Let the consumer be aware of their responsibility of having a checking account and writing bad checks. It is time to get off the banks on this issue.

Sincerely,

W.R. "Pete" Butcher  
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