

From: Monte Thiebaud [monte@dublinnationalbank.com]  
Sent: Thursday, September 16, 2010 5:42 PM  
To: Overdraft Comments  
Cc: [Name]  
Subject: FIL-47-2010 Comment

Attachments: header.htm; image002.gif  
September 16, 2010

Federal Deposit Insurance Corporation  
550 17th Street NW  
Washington, D.C. 20429-9990

Delivered via e-mail:  
[OverdraftComments@fdic.gov](mailto:OverdraftComments@fdic.gov)

Re: FIL-47-2010

Dear Sir or Madam:

I work at a \$27 million asset size bank that has been in this community for 117 years since 1893.

We employ 12 to 14 people and serve the banking needs of approximately 2,200 people in this area as customers and the rest of the population from being a good bank citizen of our community.

We retain our customers because of the customer service we provide them. If they felt as though we were taking advantage of them, we would certainly no longer be their banker.

We believe the six overdrafts, in a rolling 12-month period, requirement is an arbitrary number that is counter to existing Reg. DD requirements that require us to provide overdraft information to our customers on a year to date basis. If the customer is not currently using this information to their advantage, will additional requirements be effective? We have a saying "you can lead a horse to water but you can't make them drink". This saying is so true. We want our customers to be financially responsible but we can't make them.

Is there a way the FDIC can introduce discretion in the monitoring of the six overdraft in a rolling 12-month period requirement.

We have to wonder if all examiners will have the same definition of an appropriate daily limits on customer costs and if the definition will be applied consistently across the nation. If this is the direction in which the FDIC is moving, please clearly define "appropriate daily limits".

The majority of our customers make sound financial decisions and, for those who do not, we already work with/counsel them to get them into the product that best fits their financial needs if we possibly can. Often times, the simple fact is the customer is doing the best they can and if we didn't work with some of them to pay their checks at what we consider a fair fee, they will join the ranks of the people who do not currently use banks. We believe a lot of customers would be driven to payday loan people who definitely charge a much higher fee than us.

Sincerely,

Monte Thiebaud  
President