

From: Warren T Biggs [wtbiggs@sbcglobal.net]  
Sent: Thursday, September 16, 2010 12:38 PM  
To: Overdraft Comments  
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)

Dear Sir or Madam:

I am writing you about my concerns with proposed new guidance on overdraft protection.

I have been a banker for 31 years, 27 of those as CEO of Panola National Bank, Carthage, Texas. During those 30 years, I have talked to and counseled with hundreds of customers concerning their overdraft status, the fees that they are paying, and ways to improve their personal cash flow to eliminate unnecessary fees. I have even made loans for the specific purpose of getting them into a positive DDA balance situation.

My experience in those years has shown me that the majority of the overdraft customers will continue to be overdrawn, regardless of counseling or being given helpful cashflow advice. I do not believe that monitoring these accounts for a rolling 12 month period will be effective for those customers who habitually abuse the overdraft convenience. These customers come from all the socioeconomic levels, as do our more responsible customers.

There are already enough safeguards and disclosures in place with Regulation DD to protect customers.

Thank you for allowing me to comment on this new guidance.

Sincerely,

Warren T. Biggs  
CEO, Vice Chairman  
Panola National Bank  
Carthage, TX 75633