

From: DONNA VARNER [dvarner95@yahoo.com]
Sent: Friday, September 17, 2010 3:36 PM
To: Overdraft Comments
Subject: NEW OVERDRAFT RULES

To Whom It May Concern:

I work at a \$185,0000 community bank that has been in this community for over 109 years. We are a one bank holding company. We employ 45 people and serve the banking needs of approximately 6,000 people in this area. Our trade territory covers Upshur County and the surrounding area.

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.

I think that the six overdrafts, in a rolling 12-month period, requirement is an arbitrary number that is counter to existing Reg. DD requirements that require you provide overdraft information to your customer on a year to date basis. We have customers that might have 6 overdrafts in one day. They are well aware of what they are doing.

I really don't think the banks have time to counsel the customer every day on this situation. After they reach the six and there is no safe and sound way to make other alternatives to the customer, do we close their account? Isn't that counter to protecting the consumer, leaving them with no bank account.

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

Also, will all examiners will have the same definition of an "appropriate daily limits on customer costs" and is this the direction in which the FDIC is moving. I think you should clearly define "appropriate daily limits".

The majority of your customers make sound financial decisions and, for those who do not, you already work with/counsel them to get them into the product that best fits their financial needs. Most that are on overdraft stay that way. They are knowledge of the fees, etc.

In closing, we are not one of those banks that pulls the stuff that the regulators have to make new laws to protect others. Why do always get punished for what the big banks do? I think we are given an unfair burden in this issue.

Sincerely,

Donna Lee Varner
Gilmer National Bank