

September 21, 2010

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

DELIVERED VIA E-MAIL:  
[OverdraftComments@fdic.gov](mailto:OverdraftComments@fdic.gov)

Re: FIL-47-2010

Dear Madam or Sir:

As President of the First State Bank, Hallsville, Texas, for 42 years, we celebrated our 100<sup>th</sup> Birthday one year ago; we employ 18 people and serve the western part of Harrison County, 12,000 people, and have a branch in Longview, Texas, adjoining Harrison County on the West. Population is approximately 73,000. Our customer base is approximately 5000 people.

With a rich heritage of community banking over 100 years, we retain our customers based on high quality personal service. They TRUST us to be their banker, particularly during the past two years of tumult of the banking system.

We feel that the six overdrafts, in a rolling 12 month period, requirement is an arbitrary number that is counter to the existing Reg. DD requirements that require the bank to provide overdraft information to our customer on a year to date basis. Can the notion of discretion in monitoring of the six overdrafts be considered?

The majority of our customers make sound financial decisions. For those who do not, we have always stood ready to work with and counsel them to select the best banking product for their needs.

Very truly yours,

Jon B. Ruff  
President