



# First National Bank

CLIFF BERG

*President and Chief Lending Officer*

September 21, 2010

DELIVERED VIA EMAIL:  
Overdraft Comments@fdic.gov

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

RE: FIL-47-2010

Dear Sir or Madam:

I work at a bank that is over \$280 Million in asset size that has been in this community for almost 25 years serving customers in various cities in North Texas. We employ over 100 people and serve well the banking needs of our customers.

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.

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.

I question whether there is any way the FDIC can introduce the notion of discretion in the monitoring of the six overdrafts in a rolling 12-month period requirement. I question whether all FDIC examiners will have the same definition of an "appropriate daily limits on customer costs" and suggest if this is the direction in which the FDIC is moving, it should 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.

Sincerely,

Cliff Berg  
President

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