



September 22, 2010

Federal Deposit Insurance Corporation

550 17th Street NW  
Washington, D.C. 20429-9990

Re: FIL-47-2010

Dear Sir or Madam:

DELIVERED VIA E-MAIL:

OverdraftComments@fdic.gov

I am the Chief Deposit Officer for The Bank and Trust, s.s.b. Our bank has been serving Southwest Texas well for 100 years. A common theme in all decisions made here is that "we do the right thing"; I was taught this when I began working here 17 years ago and that way of doing business still holds true today. Our customers are long-time customers because we do right by them; always have and always will.

For the most part, our customers are making sound financial decisions. Those that aren't receive communication from us and we offer alternatives to items such as overdrawing their account. We don't need guidance to tell us to do the right thing because we are already doing it. Customers like knowing that we are there for them; whether they've made a mistake or just simply don't want to balance their checkbook. The fact is, times are tough and customers like being able to overdraw their account and don't mind paying a fee for the service. They would much rather pay the bank \$25 for paying their check into the overdraft than pay the bank \$25 for returning their check unpaid and pay the payee another fee, in the ball park of \$25.

The decision to limit overdraft fees to six in a rolling 12 month period is one that I feel will hurt consumers. There are banks out there that could stop paying overdrafts all together and start returning those checks left and right. Then, where is the consumer? Also, the rolling 12 month period is not in line with our current requirement under Regulation DD to report a customer's statement-to-date and calendar-year-to-date fees.

I appreciate being able to comment on this matter and urge you to reconsider. We wouldn't be here after 100 years if we did anything other than protect our customers.

Sincerely,

Twana Billeaudeau  
Chief Deposit Officer

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