



# First National Bank

September 22, 2010

Federal Deposit Insurance Corporation DELIVERED VIA E-MAIL:  
OverdraftComments@fdic.gov  
550 17<sup>th</sup> Street NW  
Washington, D.C. 20429-9990

Re: FIL-47-2010

Dear Sir or Madam:

My name is Bill Landiss and I am the CEO of a 120 year old bank in Giddings Texas. We have \$145 million in total assets and no out of town branches. We employ 35 people in our community of approximately 5,500. We have a wide customer base, and provide what we think is the very best in personal service. Because of this, I am concerned that the proposed regulation to impose a 6 overdraft limit in a rolling 12 month period, will arbitrarily preclude providing this service for many who desire it. Many of our customers appreciate this service as an alternative to maintaining an accurate picture of their account balance, and for other reasons.

I also have a general awareness of the inconsistent rolling time range for which banks must reach out to their customers to counsel them on their overdraft usage. This procedure will impose additional compliance burdens and costs on all banks, which will likely lead to increased costs for all bank customers. I am additionally struck by the regulatory uncertainty currently being promulgated by all regulatory agencies, which is very unsettling to our entire industry, including our community bank. This ambiguous guidance is certainly another important example. It is my opinion that this uncertainty is greatly to blame for our industries reluctance to enthusiastically embrace our possible economic recovery. A major help in this area would be to relieve banks of new and ambiguous supervisory expectations and obligations. These are viewed by our industry as a compliance nightmare, overly expensive, a major detriment to our forecasting process, and not beneficial to our customer.

I appreciate your providing me with the opportunity to comment on this matter and I hope the FDIC will reconsider the promulgation of this ambiguous and arbitrary guidance.

Sincerely,

Bill Landiss  
President and  
Chief Executive Officer

108 East Austin • P.O. Box 269 • Giddings, Texas 78942-0269 • (979) 542-1200  
Fax (979) 542-0788 • Web site: FNBGiddings.com • E-Mail: info@FNBGiddings.com