

**From:** Mike Lee [mlee@cnbwax.com]  
**Sent:** Wednesday, September 22, 2010 5:32 PM  
**To:** Overdraft Comments  
**Subject:** FDIC's Financial Institution Letter 47-2010

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

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

Re: FIL-47-2010

September 22, 2010

Dear Sir

I am a Director and Executive Vice President for a \$540,000,000 bank that has been in our community since 1868. We employ 165 people and serve the banking needs of approximately 65,000 people.

We are a Community Bank that is proud of establishing strong relationships with Multiple Generations of Families throughout our community. If these Families felt as though we were taking advantage of them, they would certainly take their business elsewhere and we would no longer be their bank.

Setting "six overdrafts in a rolling 12-month period" is an arbitrary number and is counter to existing Reg. DD requirements. Current standards require banks to provide overdraft information to customers on a year-to-date basis. We provide overdraft coverage when our customers need it. How do we use this discretion with our customer, when "six overdrafts in a rolling 12-month period" is set as a requirement? How can we expect all FDIC examiners to have the same definition of "appropriate daily limits on customer costs" and effectively apply that definition across all Banks?

Fewer than 20% of our customers routinely utilize overdraft privileges. Many of the customers who utilize overdraft protection do so as a sound financial decision, to avoid fees and penalties from retailers and business. For those who do not use it responsibly, our Personal Bankers work with/counsel them to get them into the product that best fits their financial needs.

Overdraft protection, at our Bank, is a great insurance policy for our customers. An insurance policy that has no cost until it is used. I wish I could have home, life or auto insurance on such a plan.

Sincerely,

J Michael Lee  
Director/Executive Vice President  
Citizens National Bank of Texas

Confidentiality Notice & Disclaimer: This E-mail may contain privileged or confidential information or may otherwise be protected by certain laws of the United States, the State of Texas, work product immunity, or other legal rules. No confidentiality or privilege is waived or lost by any mistransmission. Access, copying, or re-use of information by non-intended or non-authorized recipients is prohibited. If you are not an intended recipient of this E-mail, please notify the sender, delete it and do not read, act upon, print, disclose, copy, retain, or redistribute any portion of this E-mail. The transmission and content of this E-mail cannot be guaranteed to be secure or error-free. Therefore, Citizens National Bank of Texas cannot represent that the information in this E-mail is complete, accurate, uncorrupted, timely, or free of viruses, and Citizens National Bank of Texas cannot accept any liability for E-mails that have been altered in the course of delivery.