

September 23, 2010

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

Woodhaven  
National  
Bank

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Delivered Via E-Mail  
[OverdraftComments@fdic.gov](mailto:OverdraftComments@fdic.gov)

Re: FIL -47-2010

Dear Sir or Madam:

I work for Woodhaven National Bank, a \$390MM Community Bank that has served customers in Tarrant and surrounding counties for over 27 years. Our Bank employs just under 100 employees and services approximately 13,000 customers. We give superior customer service and our customers appreciate us helping them with their personal and business needs. If we were taking advantage of them in any way, they would surely take their business elsewhere.

The proposed requirement that states we must monitor our overdraft program for excessive or chronic customer use and undertake meaningful and effective follow-up action should a customer overdraw his account on more than six occasions in a rolling twelve-month period is of concern to our organization.


The majority of our customers make sound financial decisions and for those who do not, we already work with them to find a product that will fit their financial needs better. Customers tell us that they appreciate their checks being paid and have no problem with the overdraft fee incurred. Should we call the customer every six months to counsel them, they will take their business elsewhere, as they do not want to be harassed.

The Bank is a for-profit company and our customers have contractual relationships with us. Limiting the amount of fees that a customer incurs as a result of violating their depository contract concerns us greatly. To stay in business, the Bank must be profitable and maintain regulatory capital requirements at proper levels.

Reg DD currently requires disclosure of the total dollar amount for all fees or charges imposed on an account for paying checks or other items that are insufficient and the account becomes overdrawn; as well as the total dollar amount for all fees and charges imposed on the account for items returned unpaid. This must be done for both the statement period and for calendar year to date. The 12 month rolling time period that is being proposed will impose additional compliance burdens and costs on the Bank that will lead to increased costs and confusion for our customers. This seems to be harmful to the customer instead of protecting the customer.

In closing, I hope the FDIC will reconsider imposing this guidance on Banks that are and continue to be fiscally strong and responsive to our customers' needs.

Sincerely,



Sharon W. Burran  
President  
Chief Operating Officer