

September 23, 2010

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

**Re: Overdraft Payment Programs and Consumer Protection, FIL-47-2010**

Ladies and Gentlemen:

Thank you for the opportunity to comment on FIL-47-2010.

The FDIC should enforce the expectations listed if it wishes to:

*Unbank the banked*

*Force customers to modify their lifestyle to conform with FDIC expectations*

*Take away freedoms and choices that customers are now knowingly and willingly making*

*Remove the freedom from the free market regarding overdraft usage*

*Create additional unnecessary burden and expense for banks*

Speaking for our small institution, (\$136 million in assets and 100 years old) we are already doing the following:

Processing from low to high

Waiving the fee for the first overdraft

Waiving the fee for overdrafts of -\$1.00 or less

Charging a lower fee than some other local banks

Allowing customers to opt out of overdraft privilege

Actively promoting a less costly alternative

Giving customers a zero percent loan to pay their overdraft balance back to us over a six or twelve month timeframe when they get in a jam

And of course we are in compliance with all regulations. We took a no-pressure approach in introducing and explaining the opt-in choice, emphasizing our linked account option.

We are particularly concerned about customers not being able to use a product to whatever extent they wish, and banks not being able to offer services that customers want. We believe in the power of competition to be the driver of bank practices in this area.

Our customers are aware of the fees and repeatedly make the choice to pay bills and buy things knowing that they will have to pay a fee. We choose whether to take on the risk of paying items that we may later be unable to collect; it's a calculated risk. We know that we are going to lose about \$2,000 per month on people who never pay us back.

I have read the ABA's response dated 9-22-10, and agree with it in its entirety, therefore I will not repeat the points it makes.

Thank you for considering my comments.

Sincerely,

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