



Central National Bank

September 23, 2010

Federal Deposit Insurance Corporation
550 17th Street NW
Washington DC 20429-9990

By electronic delivery to:
OverdraftComments@fdic.gov

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

Dear Sirs:

Thank you for the opportunity to comment on the proposed FDIC FIL regarding the management and oversight of overdraft protection programs. This is an important topic and one that we do not take lightly.

Central National Bank & Trust Company has been serving Oklahomans for nearly 100 years. In our local communities, we are actively involved in the everyday lives of our neighbors and friends. We were an early adopter of an automated overdraft program. Our program is based on account type. Each account type has a specified dollar amount of overdrafts possible. We charge a set fee per occurrence. There are no daily fees or any other kind of fee. From day one we have disclosed the program to customers and given them the opportunity to decline the program. Our program requires the overdrafts to be brought current every 30 days. At 45 days, those amounts are charged off. We have a program designed to assist those customers who find they cannot meet the 30 day requirement. They are allowed to set up a customized plan to clear the overdrafts.

The feedback we get from our customers has always been generally positive. They understand the program's purpose is to protect them from an inadvertent overdraft and they appreciate the convenience of it. When we analyze the group of customers that use automatic overdraft protection, we find that they cross all socio-economic groups.

With the recent regulatory changes and opt-in requirements, it makes sense to allow the "dust to settle" and see the impact of the changes in regards to customer's behavior. We urge the FDIC and the other primary federal regulators to allow the marketplace time to operate under the new rules so its success can be measured. If the intended goal is achieved, no additional rules would be required. If the intended goal is not achieved, at that time additional interagency guidance could be crafted.

The American Bankers Association has prepared a very detailed comment letter. We concur with the information they have put forth and oppose new regulation on overdraft protection at this time.

Sincerely,

/s/

Mickie L. Giberson
Assistant Vice President and
Compliance Officer