

From: Lori Kelley [lori@firstfederalsl.com]
Sent: Thursday, September 23, 2010 10:09 AM
To: Overdraft Comments
Cc: [Name]
Subject: FDIC Overdraft Programs supervisory guidance
To Whom It May Concern:

It is critical that the FDIC not set arbitrary definitions of excess or chronic use in regards to overdraft programs. These additional restrictions will impose burdensome new regulatory requirements that will add significant compliance burdens to the detriment of the consumer.

Financial institutions already disclose to consumer's overdraft fees and how overdraft programs work. Consumers can make the choice on how they wish to handle their checking accounts and whether they want to put any oversight into it. Additional regulations will not improve the desire for consumers to manage their accounts.

We request that the FDIC refrain from imposing such requirements at this time, when the state of overdraft programs and customer experience with them is unknown.

Thank you for your consideration of this issue.

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