

From: Elizabeth Rhoades [elizabeth.rhoades@vintagebank.net]
Sent: Thursday, September 23, 2010 12:47 PM
To: Overdraft Comments
Subject: Letter of Concern
September 22, 2010

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

DELIVERED VIA E-MAIL:
OverdraftComments@fdic.gov

RE: FIL-47-2010

Dear Sir or Madam:

I work at a \$150,000,000 bank that has been in this community for 10 years. We employ 38 people and serve the banking needs of approximately 6,000 people in this area. We are able to retain these customers because of the customer service we provide them. If they felt as though we were taking advantage of them, they would certainly take their business elsewhere and we would no longer be their bankers.

We are concerned that the “six overdrafts in a rolling 12-month period” requirement is an arbitrary number that is counter to existing Reg. DD requirements that require banks to provide overdraft information to customers on a year-to-date basis. Will all FDIC examiners have the same definition of “appropriate daily limits on customer costs”? If this is the direction in which the FDIC is moving, I would assume that you will clearly define “appropriate daily limits.”

I reiterate, the majority of our customers make sound financial decisions and, for those who do not, we already work with/counsel them into the product that best fits their financial needs.

Respectfully submitted.

Elizabeth Rhoades