

From: Audrey Roering [Audrey.Roering@mn-bank.com]
Sent: Thursday, September 23, 2010 11:17 AM
To: Overdraft Comments
Subject: overdraft suggestions

To whom it may concern:

I am writing on behalf of Minnesota National Bank located in Sauk Centre here in central Minnesota. We have 2 branches, one in Long Prairie and one in Pelican Rapids. In 2003 we instituted an overdraft program called Bounce Privilege which allows a customer to overdraw their account up to a limit of either \$300.00 or \$500.00. They receive information on this at the time of account opening. They also receive a letter 60 days after the account is opened explaining the features of the program. When they overdraw their account for the first time, they receive still another letter along with the overdraft notice. If they should remain overdrawn for 15 days, they receive still another letter. If they remain overdrawn for 30 days, their Bounce Privilege is "suspended" and they again receive notification of this. Ultimately if they remain overdrawn for 60 days, their account is closed and again they receive a letter. We have sent letters to all these customers explaining the recent regulatory changes regarding the Opt-In option and explained how this would affect their ATM and point of sale debit card transactions. We had a very good response to this mailing.

As a result of these letters we have had customers choosing to either "Opt-in", set up sweep or linked accounts, and some choosing to set up a line of credit. **I want to urge the FDIC to avoid imposing any new monitoring or follow-up requirements for this program. It would be very costly and an additional burden to try to implement a tracking program to once again communicate with consumers who choose to use the Bounce Privilege program more than 6 times in a 12 month period.** Our bank provides responsive, responsible customer service for our customers and the proposed monitoring and follow-up regimes could cause unnecessary embarrassment and annoyance to our customers in addition to the burden that it would place on our bank.

Again, **please urge the FDIC to avoid any additional monitoring or follow-up requirements.** Thank You!

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