

**From:** Dale Wilson [dwilson@fsbsandiego.com]  
**Sent:** Thursday, September 23, 2010 12:54 PM  
**To:** Overdraft Comments  
FDIC  
Washington D.C.

Howdy,

I am CEO of a 55 year old state bank in Texas. We are a little over \$50 million in asset size and employ 20 people. Regulatory burden is huge for small banks and is pushing us away from offering some products to our customers—i.e. home loans. However deposit accounts are not a product we can opt out of offering and thus I urge you to not add to our burden of offering checking accounts to the local community of 5,000 residents. Over my 30 years of banking, I have on numerous occasions had discussions with habitual overdraft customers. Many of the times an extra \$2,000 in their accounts would have completely eliminated the problem of NSF fees because they were never overdrawn more than that. I have often made them a \$2,000 loan to deposit into their account so they would never again be overdrawn. It doesn't work. I suppose we could close their accounts and move them out of the banking system to a cash only lifestyle. If they run short of money they could go to the pawn shop or payday lender.

I agree with the monthly communication on bank statements making customers aware of the amount of fees they have paid but my experience is if they don't change their behavior armed with that information, counseling won't work.

**Dale K. Wilson**  
**Chairman of the Board, President & CEO**  
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