

Woodhaven
National
Bank

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September 23, 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 Woodhaven National Bank in Fort Worth, Texas. Woodhaven National Bank is a community bank (\$390 Million in Assets) that has been serving Fort Worth and its surrounding communities since 1983. We currently employ 90 people and serve the banking needs of approximately 13,000 customers in this area.

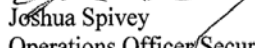
Woodhaven National Bank has been able to thrive and grow over the years even in a very competitive market like the DFW area. We've been able to accomplish this by continuing to provide excellent service to our customers in the community. However, I feel that the FDIC's proposed guidance was founded on the belief that banks are using their overdraft payment programs to take advantage of their customers. That is an entirely inaccurate picture of how we operate. With competitors on every corner, we are doing everything in our power to retain the customers that we have. Our commitment to a higher standard of service to our customers is evident by our continued growth and success.

Therefore, there are a few areas of the supervisory guidance that I would like to address. First, the requirement that states we must monitor our overdraft program for customers with excessive use or for customers who have more than 6 overdrafts in a rolling 12 month period and then take meaningful and effective follow-up action is a serious concern to our bank. For the most part, our customers make good financial decisions. For the ones who have a problem, we already work with them to place them in a product that fits more of their needs. Most of our customers appreciate us paying their checks because it eliminates embarrassment and extra fees they may be charged from the party they wrote the check to. Secondly, Reg DD already requires us to send out notices to our customers informing them of any fees or charges incurred from either paying checks that result in over drafting of the account or fees incurred due to returning the checks. This

must be done for the statement period and year to date. By implementing a rolling 12 month cycle, you are creating confusion to our customers as well as additional compliance burdens and cost to the bank. Finally, the bank operates as a for-profit organization with contractual relationships with our customers. By limiting the amount of fees we can charge as a result of a customer violating their depository contract is also a great concern. The bank must make a profit while complying with regulatory capital requirements to stay in business. Therefore, by imposing these proposed guidelines you are creating more costly regulatory burden that will in no doubt adversely affect our ability to continue providing our customers and community with the excellent service that they've come to expect over the past 27 years.

I urge you to please reconsider imposing this guidance on banks that have been and continue to be financially sound and responsive to our customers needs.

Sincerely,


Joshua Spivey
Operations Officer/Security Officer