

From: kimc@thebank-louisiana.com [<mailto:kimc@thebank-louisiana.com>]  
Sent: Monday, September 27, 2010 10:08 AM  
To: Comments  
Subject: FDIC Proposed Guidance on Overdraft Coverage

Kim Chiasson  
1304 N Cutting Ave  
Jennings, LA 70546-4202

September 27, 2010

Dear Comments to FDIC:

By electronic delivery to:  
[OverdraftComments@fdic.gov](mailto:OverdraftComments@fdic.gov)

Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429-9990

Re: Overdraft Payment Supervisory Guidance, FIL-47-2010, August 11, 2010

Dear Sir or Madame:

Kim L. Chiasson, BSA/Compliance Officer for The Bank, Jennings, Louisiana. As of 8/31/2010 our asset size was \$138,902,447. We are a community bank serving primarily customers located in rural areas. Our bank is comprised of a main office and (2) branch locations, one of the branches is located in an MSB. We opened our main office and one branch on February 26, 1997 with approximately 25 employees from a former local bank following a President and two seasoned executives who knew the financial needs of the customers in our community. Our bank opened offering simple, understandable deposit and loan products. The only complications to those products have been all the regulatory changes, changes that the customers don't understand and don't like such as Escrow. In addition all the Regulation E changes have also complicated simple products and further regulatory confusion is not necessary. Our new accounts personnel actually take the time to visit with their customers, they find out what their financial status and needs are, they do not offer or place our customers in a product that will neither benefit them or the bank. We still offer customer service, if a customer is having problems with their account and the managing of that account we try to take proactive measures. Community banks like ours cannot afford to offer onerous or confusing products and services, if our customers fail so go we. I think most community banks are already complying with the concerns addressed in the proposals, just because that's the way we do business. We are a business and helping our customers and our community meet their financial goals ensures a strong and healthy bank for our directors, stockholders and community.

I urge the FDIC to carefully consider this measure to ensure that the guidance does not impede my bank's ability to provide overdraft coverage services to my customers. If we are forced to abandon or significantly alter these services due to regulatory burden, the result could lead more consumers into becoming unbanked or relying on other products such as prepaid debit cards and check cashing services, which have higher fees and foster unsound financial practices.

Sincerely,  
Kim L. Chiasson  
337-824-0033