



WARDSVILLE / META / LINN / HOLTS SUMMIT / BELLE
www.midambk.com

September 27, 2010

To: Federal Deposit Insurance Corporation

Via: OverdraftComments@FDIC.gov

From: Mid America Bank, Linn, MO

RE: Overdraft Payment Supervisory Guidance

Mid America Bank is a \$230 million bank located in mid Missouri. Upon reviewing the above mentioned proposed guidance we feel it is imperative that we raise a voice of concern that the guidance as proposed places unnecessary hardship on both our institution and our customers. We have initiated a number of changes in our management of depositor relationships relative to the handling of overdrafts, and work diligently to make our customers aware of options available to better manage account relationships and reduce overdraft fees.

The proposed stipulations that the bank monitor accounts for chronic use and undertake "meaningful and effective follow-up action" with those customers is onerous and will be extremely difficult to administer. Further stipulations with respect to the manner of payment for transactions and proposed daily limits on fees are unwarranted. We already provide detailed information on monthly statements to our customers regarding fees assessed. The customer should ultimately have the option to decide if those fees are excessive. Implementing these changes will most likely cause us and other banks to return more checks unpaid and the customer will ultimately suffer by incurring higher fees imposed by both banks and the merchants that must then collect those checks.

We work diligently to inform our customers of the options available to help them manage their account relationships and the majority of them have willfully opted in to our program. This proposed guidance will add additional layers of regulations and associated costs for our bank and, in our opinion, will ultimately confuse and alienate many of our customers.

Gary Foltz
Director of Operations

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