

From: Barry Gober [<mailto:bgober@fsbgraham.com>]
Sent: Monday, September 27, 2010 4:32 PM
To: Overdraft Comments
Subject: Overdraft Protection Comments

September 24, 2010

Federal Deposit Insurance Company
550 17th Street, N.W.
Washington, D.C. 204429-9990

Re: Overdraft Payment Programs and Consumer Protection, FIL-47-2010

Ladies and Gentlemen:

I work for the First State Bank in Graham, Texas. We have served the financial needs of our local community since 1982. We employ 27 people and provide banking services to several thousand people in this area.

It is our intention to grow our customer base by serving the needs of our community. That is how we have grown from a de novo bank in 1982 to our current asset size of \$123,000,000. If we were to take advantage of our customers, they would take their business to another bank. But given the fact that we have experienced steady growth going back nearly 30 years and have many longtime loyal customers, we feel that our relationship with our customers has been beneficial for both parties.

One of the concerns that we have with the changes to the Overdraft Protection guidelines is the ambiguity regarding the “six overdrafts in a rolling twelve month period” and the banks obligation to provide “meaningful and effective” follow up action to those customers that fall into this category. This would prove to be extremely costly especially to smaller banks where personnel is stretched thin already. Most customers who have chosen to opt-in to the Overdraft Protection program have made an informed choice and are free to change their minds and discontinue the service. To require additional counseling is both redundant and expensive.

Another point that we would like to see clarified is the “appropriate daily limit on consumer costs”. A definition of this term would be appreciated.

In closing, I must reiterate the fact that the majority of our customers make sound financial decisions and for those who do not, we already work with these customers to guide them to the financial services that best fit their needs.

Sincerely
Barry T.Gober
Vice President