

From: rguerin@banksis.com [<mailto:rguerin@banksis.com>]  
Sent: Monday, September 27, 2010 11:03 AM  
To: Comments  
Subject: FDIC Proposed Guidance on Overdraft Coverage

Roger Guerin  
PO Box 472  
Sanford, ME 04073-0472

September 27, 2010

Comments to FDIC

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:

My name is Roger Guerin, SVP & CFO of Sanford Institution for Savings (SIS), Sanford, Maine. Sanford Institution for Savings is a \$425 million community mutual savings bank serving the financial needs of York County, Maine. SIS is the only bank based and headquartered in central and western York County. Our 110 employees have a big impact on the financial viability in the rural communities we serve and live in. Our bank's market place is quite diverse from the rural hills of the western part of the county, the low-income blue collar former mill towns and the vacation coastal area of the county.

I strongly oppose the FDIC's proposed guidance (FIL-47-2010) that addresses overdraft coverage programs. Simply put now is not the time to introduce further regulation targeted at overdraft coverage products. My bank has just implemented new requirements under Regulation DD (Truth in Savings) and Regulation E (Electronic Fund Transfers) at great expense and manpower.

I am shocked that this guidance is being proposed after the major implementation of Opt-in/Opt-out program has been in effect for only 30 days. So much effort, expense, training, documentation for employees and the benefit of customers went was just completed within the last 9 months. Having to rework our bank's deposit products and to accommodate a regulatory moving target does not help my bank serve its customers.

Customers were educated about the ODP product and spoke positively about

the product. I fear that this proposal will ultimately do a great disservice to my customers, many of which appreciate the assurances that accidental overdraft coverage offers in preventing a bill being returned unpaid or a merchant-imposed fee being levied. If regulatory barriers and requirements become too burdensome, I will be faced with discontinuing these services and returning all check and ACH transactions, exposing my customers to fees far greater than those imposed by my bank.

Sanford Institution for Savings is a mutual community bank. My bank does not manipulate transaction processing to generate more fees and higher revenue. My bank is accountable to its community and its success is dependent on a mutually beneficially relationship with customers. If we engaged in "price-gouging" tactics, we COULD NOT do business in our 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,  
Roger Guerin  
207-324-2285