

From: hinesd@communitybankpkbg.com [<mailto:hinesd@communitybankpkbg.com>]  
Sent: Monday, September 27, 2010 1:23 PM  
To: Comments  
Subject: FDIC Proposed Guidance on Overdraft Coverage

David Hines  
631 Juliana St.  
Parkersburg, WV 26101-5137

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:

I strongly disagree with any further regulation as far as overdraft programs. We have just recently went through a costly, labor intensive program to go back and give our customers an opportunity to opt-in or opt-out of our overdraft program, of which the majority still wanted the program.

At account opening we offer the customer the opportunity to opt-out of an overdraft program, or we offer to tie their checking account to a savings account or to a charge card for overdraft protection.

Our overdraft program is purely a program that we offer to customers so their checks won't be sent back or they won't be turned away from a point-of-sale transaction. It allows them to make a mistake without being highly penalized. If they opt-out, their checks will be sent back and charged and then when the merchant receives them, they can run them back through and if it stills overdraws the account, the check will be sent back again and charged and then most likely the merchant will also charge them a fee. If they had the overdraft program there would have been just one charge instead of 3 charges and the possibility of their check being turned over to the local authorities.

It would be very expensive for us to try and monitor overdrafts for excessive or chronic use and then contact the customer to discuss less costly alternatives. Having said that, when customers do call concerning the amount of overdrafts on their account, we do remind them of the

alternatives, such as tying their checking to a savings account.

Ultimately it is the customer's responsibility to keep track of their checking account. With today's technology such as Internet Banking, it is even easier for customers to keep track of their checking account.

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,  
David Hines  
304-420-5548