



**Tommy L. McCulloch, Jr.**  
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Federal Deposit Insurance Corporation

DELIVERED VIA E-MAIL

550 17th Street NW  
Washington, D.C. 20429-9990

OverdraftComments@fdic.gov

Re: FIL-47-2010

Dear Sir or Madam:

I work at Fidelity Bank, asset size \$200 million, that has been serving our community for seven years. We employ 40 people and serve the banking needs of approximately 9000 people in this area

We retain our customers because of the customer service we provide them. If they felt as though we were taking advantage of them, they would certainly take their business elsewhere and we would no longer be their bankers.

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. Having to rework our bank's deposit products and to accommodate a regulatory moving target does not help my bank serve its customers.

Any additional rules should be the result of an inter-agency effort to ensure consistency and fairness in its application for both banks and the customers we serve.

Sincerely,

*Tommy McCulloch*  
Tommy L. McCulloch, Jr. *TM*

President/CEO

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