

From: Barry McCune [bmccune@claycountybank.com]
Sent: Monday, September 27, 2010
Subject: Proposal Overdraft Payment Supervisory Guidance

In regards to the Overdraft Payment Supervisory Guidance, I disagree with the fact that the FDIC suggests we do not offer overdraft customers a less costly alternative. We are a small community bank that offers a linked account to “sweep” funds for overdrafts and affordable small dollar loan.

Banks do not make our customer overdraft. It is up to the customer to balance their check books and not to spend more money than they have in their accounts. I believe more financial responsibility should be tough in our school systems. I see customers all the time who do not know how to balance a check book. Some of them are highly educated individuals.

Another fact the FDIC and other regulators do not consider is what if all banks decided not to pay overdraft transactions. There would still be overdrafts fees to the customer based upon the number of items being returned. Additionally most of these items being returned will come back through the system again and they may be charged additional fees for the second return. Then when the payee of the check contacts the customer to pick up the bad check they are charged a bad check fee close to what the bank already charged. How does this help the consumer? I bet the consumer would rather just pay the bank once and have the overdraft paid.

Let the consumer be aware of their responsibility of having a checking account and writing bad checks. It is time to get off the banks on this issue.

Sincerely,

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