

From: mmiller@ccb-idaho.com [<mailto:mmiller@ccb-idaho.com>]
Sent: Monday, September 27, 2010 11:33 AM
To: Comments
Subject: FDIC Proposed Guidance on Overdraft Coverage

Mary L. Miller
201 South Main
Pocatello, ID 83204-3206

September 27, 2010

Comments to FDIC

Dear Comments to FDIC:

By electronic delivery to:
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 am currently an employee of Citizens Community Bank, which is a small community bank in Idaho. I have been working in the banking industry for 33 years and am currently the Compliance Officer for CCB.

I wish to comment on the FDIC's proposed guidance (FIL 47-2010) that deals with overdraft coverage programs. STOP! It is time for the individuals in this nation to learn once again how to become responsible for their actions; it is past time for the government to butt out. We are not a stupid generation, but I fear with all of the government intervention, we are becoming a nation of citizens unable to think for ourselves.

Of my 33 years in banking, 30 of those years have been on the front line waiting on customers; much of that time I was responsible for assisting overdraft customers. Very few of these customers were unable to understand how the overdraft system works. They chose to overdraft. Many times I have heard the comment that they would prefer to overdraft as opposed to getting a loan from a payday loan firm; it saved them money in the long run. Let them make the choice of what is best for them; the government does not always know what is best!

This proposal will ultimately do a great disservice to our 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.

We need to eliminate the requirement that banks monitor programs for excessive or chronic use (six overdrafts in a rolling twelve month period) and then contact the customer (in person or via telephone) to discuss less costly alternatives. This mandate would be extremely burdensome and operationally unworkable for my bank and would result in an excessive number of calls, causing us to either discontinue our overdraft coverage program, or to close the customer's account and return all payments. Citizens Community Bank is a very customer-friendly bank. When accounts are open, we offer our services to our customers. We do assist customers in balancing their statements (at no cost to the customer) and we do offer them the various alternatives to overdrawing the account.

Please reconsider this proposal. It will not be for the benefit of the consumer and it will cause undue hardship on the banks in this nation, who have taken huge hits from recent regulation, without regard to whether their bank created part of this nation's problems or not.

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,
Mary L. Miller
208-232-5373