

First State Bank OF WILTON

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September 27, 2010

Federal Deposit Insurance Corporation
550 17th Street NW
Washington, D.C.
20429-9990

RE: FIL 47-2010 Overdraft Payment Programs and Consumer Protection

Dear Sirs:

This letter is in response to FIL 47-2010 Overdraft Payment Programs and Consumer Protection.

We are a \$31 million asset sized bank located in Wilton, a town with a population of 850 located in west central North Dakota. The majority of our loans are farm related loans. Ours is a one bank shop and we operate with eight full-time and one part time employee. Our overdraft program offers to customers the option of an overdraft protection plan that transfers from a savings or another checking account.

I have read the ABA comment letter on the Overdraft Payment Programs and Consumer Protection, FIL-47-2010 and I agree with the points made in the ABA comment letter.

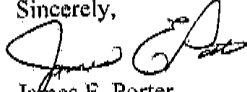
Our attitude has always been to do our best to be compliant with the rules and regulations. We recently spent considerable time, effort and money to comply with the changes to Reg. E and DD. The new changed rules and regulations enhance the power that the customer has. Our customers have, in my opinion, always been informed of the options that they had available in handling their checking accounts with us. To date 73% of our customers have opted in to the Reg. E and DD changes.

I ask your agency to please not impose on us any new monitoring and follow up requirements. A follow up contact may be embarrassing or annoying to customers. Especially, if it is a contact made when the customer is at work or if it interrupts their sleep after working the night shift. The group of customers with excessive overdrafts that the FIL addresses represents a small group of customers. In our situation this group represents less than ten percent of our customers. Also, six overdrafts in a twelve month period are not excessive.

I also ask that you not impose an annual board approval of the overdraft program. I don't believe that this 'micromanagement' of the board would be time well spent on their behalf.

As you look at this regulation as well as future regulation please, please, please bear in mind the massive regulatory burden that we banks already carry, and that you have the power to regulate us out of business.

Sincerely,

A handwritten signature in black ink, appearing to read "James E. Porter". The signature is written in a cursive style with a large initial "J" and "P".

James E. Porter
President