

From: dprice@mountainwestbank.com [mailto:dprice@mountainwestbank.com]
Sent: Monday, September 27, 2010 6:43 PM
To: Comments
Subject: FDIC Proposed Guidance on Overdraft Coverage

Dan Price
2970 E St Lukes St
Meridian, ID 83642-3506

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 from a \$1.2 billion community bank located in the Northwest. Mountain West Bank is focused on delivering deposit and loan products to communities in Idaho, N. Utah and E. Washington. The vast majority of our consumer and business customers currently enjoy totally free checking with no minimum balance. Because of sweeping "financial reform" we are nearing a point where we will need to begin charging these 30,000+ customers for their accounts in order to make up for the lost income that the financial reform has caused.

As a result, 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. Our bank has just implemented new requirements under Regulation DD (Truth in Savings) and Regulation E (Electronic Fund Transfers) at great expense and manpower.

Frankly, I don't get why there is such a great push for the Government to regulate NON-HIDDEN bank fees. Fees have always been, and should continue to be, a customer's choice. Our bank does not manipulate transaction processing to generate more fees and higher revenue. Our bank is accountable to its community and its success is dependent on a mutually beneficially relationship with customers. If we engaged in "price-gouging" tactics, we COULD NOT do business in our community.

I am a strong believer in letting the free market balance itself. Our community bank must be competitive to stay in business. We must take GREAT care of our customers to stay in business. We need to charge some

fees to stay in business. We need to take GREAT care of our community to stay in business. I believe we can, and will, do this without further mandate and regulation needed.

Thank you for your consideration.

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,

Dan Price
208-884-6800