

From: t.soenksen@bankatcfb.com [<mailto:t.soenksen@bankatcfb.com>]  
Sent: Monday, September 27, 2010 10:53 AM  
To: Comments  
Subject: FDIC Proposed Guidance on Overdraft Coverage

Thomas Soenksen  
1442 Lincolnway  
Clinton, IA 52732-7043

September 27, 2010

Comments to FDIC

Dear Comments to FDIC:

By electronic delivery to:  
[OverdraftComments@fdic.gov](mailto: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:

Citizens First Bank Clinton, Iowa is a 10 year old community bank with 100% local ownership. Our mission is to provide banking services to our community only. Our bank currently has a overdraft program for our customers and I as president am not aware of 1 complaint with our program.

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.

Lastly, I fear that this proposal will ultimately do a great disservice to my 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. If regulatory barriers and requirements become too burdensome, I will be faced with discontinuing these services and returning all check and ACH transactions, exposing my customers to fees far greater than those imposed by my bank.

I ask that you allow us to provide a service the customers appreciate. It is my experience that the relationships we have with our customers will provide the vehicle to curb excessive overdrafts and allow us to provide a fair and consistent service.

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,  
Thomas Soenksen  
5632436000