

September 22, 2010

Delivered VIA Email:

[OverdraftComments@fdic.gov](mailto:OverdraftComments@fdic.gov)

Federal Deposit Insurance Corporation  
C / O Overdraft Comments  
550 17th Street NW  
Washington, DC 20429-9990

Re: FIL-47-2010

Dear Sir or Madam:

As a 20 year employee of TexasBank, a \$265,000,000 community bank in Texas, I feel strongly compelled to express my total frustration with the current thought process on Overdraft Payment programs. We serve the financial needs of over 20,000 customers- each of whom is a consumer. We retain and grow our customers because we service their needs to their satisfaction. They would certainly take their business elsewhere if they thought we were taking advantage of them and I would not blame them for it. Placing an arbitrary limit of overdrafts you can assess a charge on in a rolling 12month period will effectively slam the door on overdraft services that consumers have elected to take. Without a doubt this will end the notion of "Free" bank services to the majority of consumers. Please do not continue making the mistake of forcing the majority into paying for the shortcomings of the minority. Consumers need to be accountable for their actions. Simply not writing a check will prevent an overdraft.

Please let the vast majority of our customers and the free market determine what is appropriate as to a limit on Overdrafts. Defining a small limit of 6 in 12 months will simply pass the burden of these overdrafts over to small businesses as collection items and these small businesses will ultimately hold the losses for the majority of checks no longer covered by Overdraft Payment programs at banks throughout the country.

The vast majority of our customers make sound financial decisions and they should not be burdened with the costs of underwriting the poor decisions of a small minority of our customers.

Very Sincerely,  
Carey Stewart  
Executive Vice President