

From: Troy Vanderburg [<mailto:tvanderburg@peoplesbanktexas.com>]
Sent: Monday, September 27, 2010 3:01 PM

September 17, 2010
Federal Deposit Insurance Corporation

550 17th Street NW
Washington, D.C. 20429-9990

DELIVERED VIA E-MAIL:
Overdraft Comments@fdic.gov

Re: FIL-47-2010

Dear Sir or Madam:

I am writing today on behalf of Peoples Bank in Lubbock, Texas. Peoples Bank has been serving Lubbock and the surrounding communities for the past 11 years. The bank has five locations and approximately 7,500 accounts and employee close to 70 people.

We pride ourselves in treating people like we want to be treated. We are successful because of the way we treat customers and because we have earned their trust and respect. If our customers felt as if they were being taken advantage of or neglected then they would certainly move to another bank.

My concern and the purpose of this letter is to ask that you strongly consider the negative impact the enforcing a six overdraft, rolling 12-month monitoring and enforcement requirement would have on our customers and on a small banking business. Our customers utilize their overdraft privileges at their choosing and they are fully aware of the cost to them to enter into an overdraft position.

It is my opinion that a requirement of limiting overdrafts to six in a 12-month period is going to have negative effects on customers who do not utilize overdraft services, in fact very few customers go into overdraft status. If banks are required to create and implement systems to monitor the spending habits of a small portion of their client base, then costs in technology and manpower are going to rise. Things that most customers get at no charge now will start to have costs associated with them around the industry. This is not fair but it is unavoidable.

We strongly desire to assist our customers in making sound financial decisions. Please consider all the ramifications of a policy change before something different is implemented.

Troy Vanderburg
SVP & COO