

From: gwalter@thebankks.com [mailto:gwalter@thebankks.com]
Sent: Monday, September 27, 2010 10:18 AM
To: Comments
Subject: FDIC Proposed Guidance on Overdraft Coverage

Gary J. Walter President
205 S. Penn, PO Box 148
Oberlin, KS 67749-0148

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:

In reading the proposed regulations and changes that are being considered regarding customer overdrafts I come up with the following question. Why is it the government's responsibility to transfer accountability from the account holder to the financial institution? Why is it our responsibility to educate people that just because they have checks, that does not mean they have money? To set a limit of the number of overdrafts an account holder can be charged in a time period is unworkable. How would we prove we talked with them and it was their choice to continue to have their account and pay fees?

The Bank offers overdraft protection to qualified account holders, thereby limiting/reducing our income from OD fees to daily interest. Not everyone qualifies, is it the FDIC stance that those accounts have to be closed? Would that not force those customers to the payday lenders or force them to use other, possibly more expensive, avenues?

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,
Gary J. Walter President
785-475-3817