Suzanne Whittle
3111 C Street
Anchorage, AK 99503-3901

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:

Northrim Bank is a community bank located in Anchorage, Alaska. We have
approximately one billion in assets and do offer an overdraft program for
Point of Sale, ACH and check transactions.

We are a community minded institution and extremely customer service
orientated. Our NSF charge is one of the lowest in the nation at $20 per
transaction. We have always offered overdraft service in regards to check
and ACH transactions. We began to offer the service for Point of Sale
transactions five years ago.

I strongly oppose the FDIC's proposed guidance (FIL-47-2010) that
addresses overdraft coverage programs. 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.

Further, any additional rules should be the result of an inter-agency
effort to ensure consistency and fairness in its application for both
banks and the customers we serve.

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.

My bank does not manipulate transaction processing to generate more fees
and higher revenue. My 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.

If the FDIC proceeds with adoption of the proposed guidance, please consider the following:

To specifically exempt ad hoc programs from this guidance. Ad hoc overdraft coverage is an extension of my bank's customer service and is based on our knowledge of the individual customer. Including ad hoc overdraft coverage in this guidance would damage the relationship between my bank and its customers.

The elimination of the requirement that banks monitor programs for excessive or chronic use (six overdrafts in a rolling twelve month period) and then contact the customer (in person or via telephone) to discuss less costly alternatives. This mandate would be extremely burdensome and operationally unworkable for my bank and would result in an excessive number of calls, causing us to either discontinue our overdraft coverage program, or to close the customer's account and return all payments.

To allow banks to charge a fee for returning items paid by check or ACH. Processing return items represent expense and employee attention and should not be provided free of charge. We evaluate all items prior to paying or returning and there are costs associated with this process.

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,

Suzanne Whittle
907-261-3346