

From: tkubli@bankofriovista.com [<mailto:tkubli@bankofriovista.com>]  
Sent: Monday, September 27, 2010 1:09 PM  
To: Comments  
Subject: FDIC Proposed Guidance on Overdraft Coverage

Tim Kubli  
150 Edgewater Dr  
Rio Vista, CA 94571-2010

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:

Bank of Rio Vista is 105 years old. Our overdraft fee is \$25 for NSF or Paid items. The maximum fee is three per day, paid or returned. Customers are not allowed to overdraft their accounts at the ATM or at point of sale. 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.

Compliance costs will cause us to close out many marginal customers. The very customers you are trying to help will become part of the unbanked.

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,  
Tim Kubli  
707-374-5711