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Subject: EGRPRA Regulatory Burden

First State Bank Southwest

To Whom It May Concern:

Thank you for giving the financial institutions an opportunity to comment on the regulations.

Please consider the following points:

Regulation B – “Evidence of Intent to Apply for Joint Credit”

This requirement seems unnecessary. If the application is completed as a joint application, that should be sufficient proof that it was the intent to apply for joint credit.

Regulation D – Limitation on Transfers from Money Market Deposit Accounts

This has placed restrictions on banks to be less competitive with non-banks and credit unions. It causes a lot of paperwork for the banks.

Regulation P – Privacy Notices

The only time a bank should have to provide this notice to the customer is when the bank's policy has changed. The majority of the customers do not pay any attention to the notice when received. It is an unnecessary expense to the bank.

Regulation E – Electronic Fund Transfers

Consumer liability from unauthorized transactions resulting in the neglect of the customer, such as writing the PIN number on the card, giving the card & PIN number to someone over the Internet, etc., should be increased. It is not fair to the banks to have to lose money in every instance for the unauthorized transactions. The customer should have to pay for their irresponsible actions.

Consumer Protection in Sales of Insurance

The disclosures required by these regulations do not fit certain products, including credit life and related products, crop and flood insurance. The focus of the rule should be on the insurance products that are similar to a deposit product and that a consumer might confuse with a deposit that is FDIC insured. This is burdensome to the bankers and confusing to the consumer.

Thank you for the opportunity to comment.

Sincerely,

Becky Berning
Audit/Compliance
First State Bank Southwest