

From: "Mark B. Werning" <MWerning@thenb.com> on 08/29/2005 03:45:02 PM

Subject: EGRPRA regulatory review

My comments are limited to Regulation D, specifically the eligibility for NOW accounts, and the withdrawal limits on Money Market accounts. We are a holding company with two national bank subsidiaries, totalling over \$450 million in assets. I'll be brief:

1. NOW Account Eligibility: It's time to remove this archaic section. Since for-profit corporations are currently exempt from maintaining NOW accounts, we must go through and maintain the process of sweep accounts, setting up separate contracts, pledging and safekeeping bank-owned investments, forwarding daily transaction confirmations to the customers, maintaining sweep balances, etc. I have spoken to Credit Union representatives, and they inform me that they are allowed to pay interest on NOW accounts with these customers. We need to make this an even playing field with competitors. Summarizing, remove NOW account eligibility rules.
2. Money Market Withdrawal Limitations: Either raise the limits for withdrawals per cycle for money market accounts, or do away with the limits. It's archaic to limit the withdrawals to three by check or six preauthorized withdrawals. Especially limiting the number by computer. Internet banking transactions have grown drastically over the recent years. These people are doing these transactions "in person", just not at a bank, as allowed by law. Therefore, raise the limits to allow 23 withdrawals per month (most business days possible in a month) no matter what type, or do away with the limits altogether.

Thank you.

Mark B. Werning
Senior Vice President - Risk Management
National Bancshares, Inc.
Bettendorf, Iowa