



FIRST
FARMERS
BANK & TRUST

July 31, 2008

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552

Dear Chief Counsel:

After reading the proposal for "Unfair or Deceptive Acts or Practices, OTS-2008-0004", we at First Farmers Bank & Trust ask that you proceed with caution before passing this proposal for the following reasons. First Farmers Bank & Trust, headquartered in Converse, Indiana, has been a community bank since 1885. Since that time, we have formed meaningful customer relationships with our customers, and we feel that several of the proposed guidelines would interfere with that relationship. Concerning overdraft protection services, many of our customers welcome this service and appreciate the fact that we offer a service designed to protect their interests. We believe that requiring an opt-out notice in every statement cycle where an overdraft has occurred would create information overload and would cause an unnecessary cost and burden to our institution. An annual notice and opt-out is more than sufficient and more likely to be noticed.

We believe that such rules and requirements should not be included under UDAP. Writing these rules under UDAP would create an unfair disadvantage for depository institutions because the rules do not apply to non-banks. If these guidelines are passed, we feel it is important that the FTC write rules to cover all institutions that offer these services. The advantage that exempt entities will receive could be damaging to our ability to properly serve our loyal customers.

Thank you for your time, and we appreciate being given the chance to share out thoughts with you. For additional information or for questions, please contact us at (877) 395-3316.

Sincerely,

Gene Miles
President and CEO
First Farmers Bank & Trust

Tade J. Powell
Vice President-Director of Marketing and PR
First Farmers Bank & Trust