



June 3, 2010

VIA E-MAIL

Federal Deposit Insurance Corporation
Attention: Comments
550 17th Street, N.W.
Washington, D.C. 20429
SafeAccountTemplateComments@fdic.gov

RE: Templates for Safe, Low-cost Transactional and Basic Savings Accounts.

Dear Sirs and Madams:

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing approximately 300 state and nationally chartered banks, savings and loan associations and savings banks located in communities throughout the state. WBA appreciates the opportunity to comment on the Federal Deposit Insurance Corporation's (FDIC) templates for safe, low-cost transactional and basic savings accounts.

WBA strongly supports an initiative to ensure that low and moderate-income consumers have access to insured banking products and services, and we recognize the efforts undertaken by FDIC in furtherance of this initiative. However, WBA respectfully does not support the creation of product templates by FDIC. WBA does not believe that the creation of such templates are warranted as most Wisconsin financial institutions already offer low-cost transactional and savings accounts based upon their own Community Reinvestment Act (CRA) plans. In addition, Wisconsin financial institutions already actively conduct financial education and outreach to these consumers.

WBA strongly believes financial institutions themselves are in the best position to know their market places and consumer needs, as well as any corresponding product costs. As a result, financial institutions should be allowed to continue to create low-cost transactional and basic savings account products without a governmental agency dictating account features and fees. Consequently, WBA respectfully requests FDIC withdraw the proposed templates.

Once again, WBA appreciates the opportunity to comment on FDIC's proposed templates.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt R. Bauer", is written over a circular stamp or seal. The signature is fluid and cursive.

Kurt R. Bauer
President/CEO

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