

July 29, 2008

Jennifer J. Johnson
Secretary
Board of Governors of the Federal
Reserve System
20th St. and Constitution Avenue, NW.
Washington, DC 20551
regs.comments@federalreserve.gov

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW.,
Washington, DC 20552
ATTN: OTS-2008-0004

Re: FRB Docket No. R-1314; OTS Docket No. OTS-2008-0004;
Unfair or Deceptive Acts or Practices; 73 *Federal Register* 28904;
May 19, 2008

To Whom It May Concern:

Vision Bank, N.A. is providing comment on the above-referenced proposed rule. Vision Bank is headquartered in Ada, OK. We are a \$450 million community bank founded in 1903 that provides banking services in several communities.

As a community bank, we are concerned with the well-being of our customers. We strongly encourage all deposit customers to maintain adequate balances to cover their needs. Occasionally, overdrafts occur on accounts. We believe we have a system that works well for both the customer and the bank. However, the proposed rule would create unnecessary and unwarranted interference in our banking relationship with our customers.

Overdraft fees already can be avoided by customers without requiring a specific advance notice and opt-out followed by repeated periodic opt-out reminders. Customers regularly manage their accounts to avoid overdrawing them. Our bank offers overdraft options today without the burdensome compliance exercise of a formal one-size-fits-all opt-out requirement.

The proposal for a partial opt-out of ATM and debit card transactions, while retaining coverage for checks and ACH, is not technically feasible under our processing system and could not be implemented without numerous exceptions due to processing system complexity. Additionally, it would adversely affect customers who use debit cards for recurring payments.

The proposal covering debit holds is far too complicated to be implemented by banks like ours or for our customers to understand. The problem is really one that involves merchants and the card networks and cannot be solved by putting the onus only on banks who are simply acting in a safe and sound manner to assure funds are available for authorized transactions.

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Vision Bank, N.A. appreciates the opportunity to submit comments on this proposal. In closing, we urge you to consider that our bank already follows sound practices for overdraft protections. Our customers ask for overdraft protection because it provides a real value to them. We do not force anyone to participate if they do not wish. Implementing this rule would harm, rather than help, our customers.

Sincerely,

Steven C. Bagwell
Executive Vice President