



PREMIER
COMMUNITY BANK

July 22, 2008

Jennifer J. Johnson
Secretary
Board of Governors of the Federal
Reserve System
20th St. and Constitution Avenue, N.W.
Washington, DC 20551

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, N.W.,
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

Gentlepeople:

We offer banking services in rural Wisconsin.
We have accommodated discretionary overdrafts to our customers that are not promoted.

The number of our customer's accounts that have a shortage during a year is 12% of our total checking accounts. The bank is a holder of our customer's funds and provides them a method in which to distribute their funds as needed. They manage their balances and ARE RESPONSIBLE, to maintain the funds necessary to pay for the disbursements they make.

It is difficult to understand why legislation is proposed that would require us to "notice" 88% of our customer base that historically has maintained the balances needed for what they disburse.

The proposed legislation will be cumbersome and costly to administer.

The partial opt out of ATM and debit card transactions would be a processing nightmare, and again, extreme overkill for a minority of our accounts that would even encounter any overdraft exposure.

It is simple to avoid overdrafts. Manage the balance in your account and don't exceed distributing the balance in that account.

It continuously amazes us that so much effort is put into designing rules, regulations, and oversight that try to remove responsibility from the account owner to the bank.

Passage of this legislation will curtail our offerings of checks cards and probably eliminate any discretionary overdrafts as an option.

The added cost of implementing and monitoring this legislation will be an additional expense we will need to pass on to account holders. It is an unnecessary notification to our account holders. It is going to be overwhelmingly difficult to explain to our account base. It will be viewed by 88% of our account holders as insulting since they are responsible in maintaining their accounts in good order.

Sincerely,


Patricia A. Mielke
SVP

Cc:

Senator Russell Feingold
506 Hart Senate Office Building
Washington DC 20510

Senator Herb Kohl
330 Hart Senate Office Building
Washington DC 20510

Representative Steve Kagen
1232 Longworth Building
Washington DC 20515