

From: Bernard Parenteau  
Subject: Electronic Fund Transfers

---

Comments:

Date: Mar 27, 2009

Proposal: Regulation E - Electronic Fund Transfers

Document ID: R-1343

Document Version: 1

Release Date: 12/18/2008

Name: Bernard Parenteau

Affiliation:

Category of Affiliation:

Address:

City:

State:

Country: UNITED STATES

Zip:

PostalCode:

Comments:

If a consumer has not specifically requested overdraft protection, they should not have it by default. And the overdraft charge should be a maximum of the transaction amount. For example, a year ago or so my then 19 or 20 year old son charged a series of very small amounts on his Washington Mutual card, not realizing he even had overdraft protection. One put his balance minimally negative, generating an additional \$35 fee, and each of the subsequent transactions generated the same fee. So for perhaps \$20 or \$30 of charges, he had about \$350 of fees without knowing it. We called, wrote, and went in-person to complain about the disproportionate nature of these fees, all to no avail. The bottom line is that this banking practice of automatic overdraft "protection" and disproportionate fees is clearly predatory, if not outright robbery.