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Subject: Electronic Fund Transfers

Comments:

Date: Mar 25, 2009

Proposal: Regulation E - Electronic Fund Transfers Document ID: R-1343 Document Version: 1 Release Date: 12/18/2008 Name: Dick Hatchell Affiliation: Category of Affiliation: Address: City: State: OH Country: UNITED STATES Zip: 45245 PostalCode:

Comments:

I recently read an article regarding overdraft fees and found myself chuckling at the attempts by current bank employees, and I presume bank lobbyists, to justify these fees. As a past employee of several banks, both large and small, I assure you that the sole purpose of these fees is to raise revenue for the bank. Indeed, several large financial institutions consider those who pay the most fees to be among their most valuable customers - not the customer who has been with the institution the longest or who conducts the most business. Years ago fees were described as the cost of doing business and that their sole purpose was to cover the cost of a particular transaction that for whatever reason went bad. Now, fee income is a "goal" given to all bank branches by the vast number of institutions in order to boost their revenue. They use that goal as an incentive for rewarding their branch level management. Don"t collect enough fees? Sorry, no incentive this guarter! Many wealthy countries, Japan being a prime example, still function on the premise that you can"t spend it if you don"t have it. A relative who lives in Japan was watching the news while visiting the US and was confused by all the anger and frustration over bank fees. He didn"t have a clue what a bank fee was. After explaining them to him his only response was: that's crazy. you either have the money to spend or you don"t. Remember those days? Bounce a check and you were so embarassed that you never did it again! Went to an ATM to get money out and it would turn you down because you didn"t have enough money? Just enter a lesser amount. Debit card turned down at the grocer? Put some of the groceries back and try again! The structure of the fee program needs to be radically reversed. If an institution can categorically show you that a bounced check cost them XX dollars to carry and to process then I have no argument with covering the cost of doing business. But in all my years in banking not a single bank representative has ever been able to show me the cold hard numbers of what their actual cost is, and frankly, became somewhat aggitated when I asked. And I suspect that they never will show us unless forced to do so by the FDIC. When the American consumer's mistake becomes a profit line for the financial institution with which they do business then it is safe to say that that institution does not have the best interest of their

clients at heart. Profits in banking should come from the considered lending for mortgages, consumer loans, etc., not from small checking account customers who are struggling paycheck to paycheck to stay afloat in this economy. It would be fascinating to see the head of a large financial institution rise to the occassion and do away with these fees and start leading the way back to the future.