

From: Laura Dargus, Cambridge, MA

Subject: Electronic Fund Transfers

Comments:

Board of Governors of Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Dear Federal Reserve Board Director:

I started up with Fleet Bank when I moved to Boston for college in 2001. At the time, I was issued a debit card in connection with a campus checking account, and transactions were NOT approved if the balance in my account did not cover the amount.

When Bank of America bought Fleet, I started incurring \$35 fees (even though I still used my old campus checking account #) for transactions that resulted in an overdraft.

The only overdraft protection that I was offered through the bank to help stop the fees from collecting was a credit card (which I was hard-sold on many an occasion that I went in to talk to someone about the amount of debt I was procuring) or connecting my checking account to my savings account (only helpful if there's money in it to cover the amount being overdrafted). I would rather the transactions (rent included) be denied than pay interest on the money BofA feels they have the right to take from me, sorry.

On one trip to a teller, I was told that I had incurred over \$1000 in overdraft fees paid to BofA in the course of a year. I'm 25 years old. That money would certainly have been useful to me in my standing in life, if for no other reason than to take a vacation or to pay off my credit card. But rather, it went to an institution that I trusted to hold my money for me.

Bank of America goes out of their way to be predatory. I signed up for their "keep the change" promotion and noticed that I'd started to get hit for overdrafts due to the fact that the bank would wait until my account was already in the negative to take out those small, infinitesimal amounts one at a time (which I assumed would be taken out at the time of purchase, stupidly), incurring a \$35 fee for EACH. They clear large purchases first, making each additional transaction a \$35 mistake (under the pretense that you'd want bigger transactions to clear--though, they never asked me personally). Oh, and they submit their customers to alarmist "identity theft" programs that (do nothing) and start to incur monthly fees if you don't call to cancel within 30 days. Great fucking bank.

I've spoken with many a staff member of BofA's regarding my financial situation. It's taken diligence on my part, but I've stopped myself from overdrafting. Though, mind you, it was not due to ANY of the customer service reps I spoke with or Bank of America's best efforts over the course of the last couple of

years. They're online banking is not a reliable means to balance one's checkbook and every time I sought help, I was told to sign up for a credit card (a harmful practice given people in my situation are likely already encountering a problem with debt).

Please stop the practice of predatory overdraft fees. They help no one but the banks themselves (and they already have enough of my tax money). I would have rather been embarrassed or paid bounced-check fees for denied transactions than willingly pay BofA to rob me.

I support the proposed requirement that would require financial institutions to obtain consumers' affirmative consent (or opt-in) before any overdraft fees or charges may be imposed on consumers' accounts.

Banks should get explicit permission before enrolling customers in the most expensive overdraft system, automatically covering overdrafts and charging high fees, and should be stopped from using unfair practices to increase their overdraft fees.

Sincerely,

Laura Dargus
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