

From: Matthew L Goguen
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Comments:

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Name: Matthew L Goguen

Affiliation:

Category of Affiliation:

Address:

City:

State:

Country: UNITED STATES

Zip:

PostalCode:

Comments:

To Whom It May Concern,

If the current overdraft system were not permitted, I would consider it criminal the way certain banks use it to fleeces consumers for honest mistakes. I have held checking accounts with PNC, Bank of America, BB&T, Wachovia, and my companies credit union. The credit union I currently use for most of my banking needs is a breath of fresh air in terms of fees, structure and not fleecing customers. A single individual using a single account should be able to manage and prevent over drafting an account if the institution is providing them with the proper tools to monitor available balances. I'm told the 1st year of marriage can be a challenge with finances, and so it was with overdraft fees from my experience. Prior to this year I had maybe three overdraft fees in my life. When multiple consumers are tapping a single account, I learned all kinds of great financial plans can become undone. Let's just say the experience was eye opening regarding overdraft and hold fees. There are two items I would like to see changed to minimize the pain to consumers that has been deliberately inflicted by banks. Several banks like to deduct transactions not by the order in which they are received, but by largest first. Deducting transactions largest 1st ensures the maximum possible amount in overdraft fees to an institution and inflicts maximum damage to the consumer. I would prefer that banks would be required to deduct the smaller amounts 1st on a daily cycle. This would still punish the consumer for not paying attention to their balance, yet minimize the financial damage to consumer. No financial institution should be allowed to asses any type of penalty fee on a transaction hold. A hold is just a reservation, a test to see if the funds are there, no funds have been transferred out of the consumers account or out of the bank. Consumers have no idea and no control on how much a merchant is going to request for a hold prior to completing a transaction. Banks should show holds only as a possible pending transaction. The credit union does not have any "hold" fees. The simple lack of this type of fee has made managing a joint checking account much easier. I have stung by a hold fee that triggered an overdraft fee that triggered 2 or three more overdraft fees

for absolutely ridiculously small transaction amounts. The sad point was, if the hold fee had not been assessed, there would have been no overdraft in the 1st place and no resulting penalty. Please consider prohibiting overdraft charges on holds or the use of holds when calculating overdraft fees and please consider either 1st in 1st out or smallest transaction 1st when calculating overdraft fees.

Regards,

Matthew L Goguen