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Subject: Electronic Fund Transfers

Comments:

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Proposal: Regulation E - Electronic Fund Transfers

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Comments:

Banks should never be allowed to enroll customers in "services" that can result in unexpected fees being assessed. Customers should have to give their permission, after full disclosure, to be enrolled in such services. Additionally, when such services are accepted, banks should not be permitted to assess fees in a manner which is the most profitable to themselves, but should instead be required to assess fees in a manner which is least expensive to the customer. As an example, if I have \$100 in the bank and I make four point-of-sale purchases using my debit card, the first three of which are for \$6/each and then make a fourth purchase for \$95.00, thus exceeding my available balance, the bank should account for those purchases in just that order by first deducting the \$18.00 (three \$6.00 purchases) from my available balance. and then deduct my \$95.00 purchase from the remaining \$94.00 balance. I would then have to pay an over limit fee for that purchase only. Instead, banks routinely deduct the largest purchase first, ie, the \$96.00, thus leaving a balance of only \$4.00. The bank then gets to charge me three over limit fees for my three smaller purchases instead of just the one fee for the large purchase which is actually the one that put me over my limit. This is nothing short of theft from customers and the practice should be abolished.