

From: Richard Stanley, NY  
Subject: Electronic Fund Transfers

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Comments:

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

Dear Federal Reserve Board Director:

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.

What I have a problem with is changing the required payment in an overdraft protection plan. In the case of M and T bank of Buffalo, New York, They say they are giving customers 10 days to pay their overdraft accounts. I must make my payment on the 20th of every month. They had a system that was very effective: You could transfer funds into your account from any number of preset up accounts. It took one day to do the transfer. For some reason this time has been readjusted to what they call a three day "standard transfer", which actually is five days. If you elect to transfer money into the account and you do it in the morning on a Monday, The actual transfer takes place the following day: Tuesday. Now your money has been taken. And now it will not show up in your checking account for another three days. In actuality, by the fifth day you still can't see or use the money. Now the weekend is here and you wait till the following Monday to be able to use your funds. If the calendar changes (a Month change) in that time period, the bank says your late with your payment. It increases the amount you owe and when your payment is credited you already behind the eight ball. You didn't pay enough. Then they charge additional "fees" to make things better. Who is kidding who. This is stealing. There is no transparency in the transaction... your money is gone and is being used by the bank to make them look better. This is not a fair practice, especially since they proved they can make the transfer in two days.

Sincerely,  
Richard Stanley  
Bowmansville, NY 14026