

From: Joshua Brockman, Saco, ME

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:

As a college student several years ago, my account was once overdrawn by over \$100 as a result of under \$10 in purchases due to a bank overdraft policy I was unaware that I had been enrolled in. These programs are presented to the consumer as a benefit, but in reality are designed to allow banks to pile on multiple overdraft fees, often catching people who are unaware of their existence. Coupled with my bank's policy of processing the largest transactions first (to ensure that an overdraft occurs as early as possible) this overdraft program cost me over \$100 based on a few simple debit card purchases (all under \$7). Had the items posted in the order they were purchased, I would have had only one overdraft charge instead of 3, and if I had not been "allowed" to overdraw my account without my knowledge I would not have been overdrawn in the first place. I believe that deliberately manipulating the order of transactions to maximize overdrafts should be forbidden, and all customers should be opted out of overdraft approval programs by default.

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,
Joshua Brockman
Saco, ME 04072