From: Andrew Stephenson

Subject: Electronic Fund Transfers

## Comments:

Date: Mar 26, 2009 Proposal: Regulation E - Electronic Fund Transfers Document ID: R-1343 Document Version: 1 Release Date: 12/18/2008 Name: Andrew Stephenson Affiliation: Category of Affiliation: Address: City: State: Country: UNITED STATES Zip: PostalCode:

Comments:

Citizens Bank has re-ordered transactions, clearing larger transactions before smaller transactions, regardless of transaction date, in order to get the most overdraft fees posted to my account as possible. At one point, I had \$30 in my account. I made 2 small ~\$5 purchases, then a \$40 purchase two days later. This would normally result in one overdraft charge of \$35, but the \$40 purchase cleared days before the small \$5 purchases, resulting in 3 overdraft charges of \$35 each instead of one.