

From: Jason Squires
Subject: Electronic Fund Transfers

Comments:

Bank of America's practice of processing the largest transaction first, instead of processing by date is predatory. By doing so, they guarantee they are able to charge more over draft fees than if the policy were the other way around, or simple ordered chronologically. I believe they let small amounts (under \$20 or so) to sit in the account for days on end in 'pending' status in order to let large transactions process. Say you have a balance of \$100 in your account and you have 5 transactions pending: \$105, \$10, \$2, \$3, \$5. They will process the largest transaction (\$105) first resulting in your account being (\$5.00) overdrawn, and they will then process the remaining four transaction, each overdrawing your account further and hitting you with \$35 a pop in fees. If they would process the transactions chronologically, the smaller transactions MAY have come first, taking your \$100 balance down to \$80, and then when it comes time to process the \$150, you're left with one overdraft. I'm not saying they should necessarily process small transactions first, but when it is obvious they process BIG transactions out of order, within 1 business day, yet you have a charge for \$1.50 sitting there for 3 business days for no reason.. there is a problem. I know that it states this rule in their terms, and I know why they do it. They should just not be allowed to do it. If they don't want to be in the business of assuming risk, maybe being a bank isn't right for them.

Thank you.

Warmest regards,

Jason Squires