

# First Federal Savings Bank

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March 2, 2009

Federal Reserve Board  
20<sup>th</sup> Street and Constitution Ave. NW  
Washington, DC 20551

Re: Proposed revisions to Regulation E

Dear Federal Reserve Board,

As an officer for First Federal Savings Bank, I do not believe that the proposed revisions to Reg E are necessary. In principle and in practice, First Federal Savings Bank strongly supports the objectives of clarity and fairness in how institutions market and administer overdraft solutions. We strongly resist the notion that there is anything intrinsically deceptive or unfair in overdraft service offerings. To the contrary, our experience confirms that when presented with the benefits and costs associated with typical overdraft protection services, consumers overwhelmingly elect to participate in these programs.

With respect,



Gregory Schrecke  
President