
From: Ruben Robledo [mailto:r.robledo@csbsa.com]
Sent: Wednesday, August 25, 2010 10:46 AM
To: Overdraft Comments
Subject: Overdraft Payment Programs and Consumer Protection

I would like to say that I appreciate the FDIC's efforts to control burdensome overdraft program's costs on consumers. However, because we do not encourage overdrafts for our customers due to the large financial burden it places on them, our institution DOES NOT offer an overdraft program. We do not advertise any kind of incentive to overdraw an account. We are having a difficult time trying to explain opt in and opt out to our customers when this Reg E law does not really apply to us because we do not have an overdraft program. I would like to know your suggestion in helping explain this Reg to our customers. This really puts banks in an unfair position when they do not even have a program that is being targeted by this regulation.

Sincerely,

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