

From: Jim Lemon [jwlemon@friendshipstatebank.com]
Sent: Tuesday, September 07, 2010 2:34 PM
To: Overdraft Comments
Subject: Overdraft Payment Programs & Consumer Protection

I would like to offer the following comments regarding the proposed guidance on automated OD payment programs. Six overdrafts in a rolling 12 month period appears to be too low for the program to be of use to the consumer. Anything less than 12 per 12 months period will have the result of forcing the consumer to alternate providers such as “payday” lenders.

Jim Lemon

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