

**From:** LeAnne Harrington [lharrington@cascadebank.com]  
**Sent:** Thursday, September 16, 2010 5:56 PM  
**To:** Overdraft Comments  
**Subject:** Comments on Overdraft Payments Supervisory Guidance

I am writing in response to the Overdraft Payment Supervisory Guidance dated August 11, 2010. Protecting the banking customers' right to make an informed decision about overdraft programs through the use of effective disclosures should be the goal for all the banking industry.

Monitoring excessive use of automated overdrafts programs will create increased regulatory burden on banks. Disclosures on monthly statements already provide an accurate picture of fees the customer is paying. In addition, the proposed guidance of 6 fees in a 12-month period being considered excessive is not appropriate. Chronic customer use of an overdraft programs would be more in line with a customer who has 20-25 or more fees in a 12-month period. Six occurrences do not demonstrate constant use of the program.

Thank you for your consideration,

LeAnne M. Harrington  
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