

From: C. William Roth [croth@bankjbt.com]
Sent: Friday, September 24, 2010 12:49 PM
To: Overdraft Comments
Subject: Comment on Overdraft Payment Supervisory Guidance

Listed below are comments on your most recent suggested guidance on overdraft programs:

- The suggestion of 6 overdrafts in a year as being the point where personal contact should be initiated is much too low. We do provide notices before they even get to six. These notices do suggest there are less costly alternatives available. It would require a lot of bank resources to make contact in person or by telephone for every customer who had 6 overdrafts or more. I am not sure I understand the rationale for personal contact at such a low trigger point given that we just had these customers opt in for ATM and debit card transactions. The customer by opting in has clearly indicated they value the product and it would be insulting at this point to approach the customer again.
- I would suggest the trigger point should be between 24-36 overdrafts per year. This may sound like a lot but it is still just 2-3 overdrafts per month. I do think it is important to offer less costly alternatives to the customers and have the customer choose the option they want which includes staying in their current overdraft program.
- Some statistics YTD 2010 – We have 9,079 customers enrolled in the program. 1,542 of those enrollees have had at least 1 overdraft in 2010. 403 of these customers have had more than 6 overdrafts YTD. The average number of overdrafts per account is 13 (of the customers who have at least one overdraft)

Thank you for this opportunity to comment on this guidance

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