

From: jkrummel1@msn.com [<mailto:jkrummel1@msn.com>]
Sent: Monday, September 27, 2010 9:23 AM
To: Comments
Subject: FDIC Proposed Guidance on Overdraft Coverage

John Krummel
1765 215th Street
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September 27, 2010

Comments to FDIC

Dear Comments to FDIC:

By electronic delivery to:
OverdraftComments@fdic.gov

Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429-9990

Re: Overdraft Payment Supervisory Guidance, FIL-47-2010, August 11, 2010

Dear Sir or Madame:

Instead of coming out with new regulations on overdrafts, how about going back to cash only society. Then no one would have to worry about ODs. You are proposing that private businesses and banks provide a service at a loss. If the consumer doesn't want OD's they can always go to cash but they don't because they feel the fees are fair and they like the service. You also need to have the government regulate OD fees charged by businesses. If you look at individual transactions, they charge more than banks and due to the lack of regulation and loop holes they are sending through OD's first as check then as ACH's and are sending through \$1.00 charges for processing a special payment which also overdrafts the account. I would say the lack of regulation on businesses and credit card companies sometimes adds \$100 to \$150 on to one transaction.

I urge the FDIC to carefully consider this measure to ensure that the guidance does not impede my bank's ability to provide overdraft coverage services to my customers. If we are forced to abandon or significantly alter these services due to regulatory burden, the result could lead more consumers into becoming unbanked or relying on other products such as prepaid debit cards and check cashing services, which have higher fees and foster unsound financial practices.

Sincerely,

John Krummel