



PONY EXPRESS COMMUNITY BANK

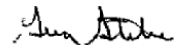
MEMBER FDIC

September 13th, 2010

RE: FDIC Overdraft Programs

Over the last few years banks in general have been required to take the stance of continued customer satisfaction, while at the same time balancing what's in the individual's best interest through customer protection guidelines. I find this latest suggestion of "The Account Watch Dog" over the top. At what point will the customer ever be responsible for their account if they continuously are counting on someone to contact them in regards to the number of overdrafts. It seems as though banks are already required to assist customers limit fees associated with overdrafts by documenting and drawing attention to monthly charges on statements and then offering "opt in/opt out" programs. I would also question the true morals of banking by suggesting they go into debt or continue to use funds from a savings account ultimately draining what liquid funds they may have. From a community bank's perspective I believe we've already taken steps to combat this topic with knowledgeable staff that continuously provide overdraft details as requested, clearing smallest checks first, and free internet banking to allow 24 hour account access. Again I come back to the point at what time is a person not responsible for the actions they take as it is the customer writing the check or making the transaction not the bank.

Regards,


Greg Sfrube, AVP

From: Site Administrator [web@responsiblelending.org] on behalf of clyde knight jr [cknightjr@tx.rr.com]
Sent: Monday, September 13, 2010 11:45 AM
To: Overdraft Comments
Subject: Stop unfair and abusive debit-card overdraft fees

Sep 13, 2010

Ms Sheila Bair

Dear Ms Bair,

I support the FDIC's recommendations that banks address deceptive unfair debit-card overdraft practices used to maximize the fees they charge customers.

I am a [*Name of Institution*] customer. I am also unemployed. I pleaded with my bank to understand that at times my account will go over as I attempt to down size and contact my creditors many of which I set up through automatic deductions which take time to undo - I am told.

I informed my bank and to date they have ignored my request to waive a portion of the 500 dollars worth of banking fees. Doubling the initial fee within a week. It seems that the more I speak the more fees they add while explaining that there is nothing they can do. I don't buy that especially since they were bailed out using taxpayer funding.

As someone who was surprised by very high fees for small purchases, I wholeheartedly agree with the FDIC's proposals and hope that the other banking agencies will follow suit. The banks should hear as often as possible that customers want overdraft coverage that is fair and reasonable.

I hope that they listen and make the changes outlined in your guidance. Providing customers with a responsible product is not only right thing to do--it's good business.

Sincerely,

Clyde Knight Jr
506 Flora Vista Ct
Arlington TX 76002

Sincerely,

Mr. clyde knight jr
506 Flora Vista Ct
Arlington, TX 76002-4790
(817) 557-1717

From: Site Administrator [web@responsiblelending.org] on behalf of Jerry Pilcher [pilchermd@verizon.net]
Sent: Monday, September 13, 2010 11:45 AM
To: Overdraft Comments
Subject: Stop unfair and abusive debit-card overdraft fees

Sep 13, 2010

Ms Sheila Bair

Dear Ms Bair,

I support the FDIC's recommendations that banks address deceptive unfair debit-card overdraft practices used to maximize the fees they charge customers.

C'mon please! The BANKS are KILLING US with overdraft fees.

Last year, WITH over \$2,000 in savings as a "back up", my bank screwed me out of over \$1,500 in Overdraft Fees.

As someone who was surprised by very high fees for small purchases, I wholeheartedly agree with the FDIC's proposals and hope that the other banking agencies will follow suit.

The banks should hear as often as possible that customers want overdraft coverage that is fair and reasonable. I hope that they listen and make the changes outlined in your guidance. Providing customers with a responsible product is not only right thing to do--it's good business.

Jerry Pilcher
Catonsville, MD 21228

Sincerely,

Mr. Jerry Pilcher
133 1/2 Newburg Ave
Catonsville, MD 21228-5110

From: Site Administrator [web@responsiblelending.org] on behalf of Jesse Bedwell [jesselevi@yahoo.com]
Sent: Monday, September 13, 2010 2:15 PM
To: Overdraft Comments
Subject: Stop unfair and abusive debit-card overdraft fees

Sep 13, 2010

Ms Sheila Bair

Dear Ms Bair,

I support the FDIC's recommendations that banks address deceptive unfair debit-card overdraft practices used to maximize the fees they charge customers.

As someone who was surprised by very high fees for small purchases, I wholeheartedly agree with the FDIC's proposals and hope that the other banking agencies will follow suit.

The banks should hear as often as possible that customers want overdraft coverage that is fair and reasonable. I hope that they listen and make the changes outlined in your guidance. Providing customers with a responsible product is not only right thing to do--it's good business.

One practice in particular that I have experienced is if I make an error in my banking and I overdraw my account, the bank will post the transactions largest to smallest which turns one fee into six fees. They say it's for our benefit but all it serves is their interests by running up the NSF fees. They pay all of the transactions anyway, why not just post them in the proper order and let there be two fees rather than six. Also, they will charge a \$35 fee for a \$2.50 transaction! The only thing my bank does that is close to being fair is they do not charge an O D fee if the total O D is less than \$10. I can say that one positive thing. The rules need to change. Not so that consumers can take advantage of the banks but so the banks cannot take advantage of consumers by posting transactions in a certain order to increas

Sincerely,

Mr. Jesse Bedwell
6630 Duffield Dr
Dallas, TX 75248-1453

From: Site Administrator [web@responsiblelending.org] on behalf of
pesach kremen [pesachkremen@hotmail.com]
Sent: Monday, September 13, 2010 2:45 PM
To: Overdraft Comments
Subject: Stop unfair and abusive debit-card overdraft fees

Sep 13, 2010

Ms Sheila Bair

Dear Ms Bair,

I support the FDIC's recommendations that banks address deceptive unfair debit-card overdraft practices used to maximize the fees they charge customers.

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[*Name of Institution*] ripped me off from Nov 2009-Jan 2010 by deliberately reordering transactions to maximize their outrageous \$35 fees, then would charge the fees causing my account balance to drop triggering more fees. They should be required to reimburse me for this unethical activity. Banks should not be allowed to assess the fees until statement time so that fees do not cause other fees, not even giving you a chance to make a deposit until it is too late. I was charged over \$700 in fees and could only get about \$200 of them reversed and had to insist on this many times. The law should require banks to reimburse customers for fees charged due transaction reordering.

Sincerely,

Mr. pesach kremen
1602 Chalmers St
Apt A
San Diego, CA 92103-4748
(619) 218-2149

From: Ray Stipp [Ray.Stipp@cbthomebank.com]
Sent: Monday, September 13, 2010 5:28 PM
To: Overdraft Comments
September 13, 2010

Following are observations about overdraft experience at our bank over the past several years:

1. The majority of our customers value overdraft services. In compliance with Reg. E we contacted eligible customers concerning their decision to opt in to our overdraft program. We found that two weeks after the effective date of opt in, 75% of our eligible customers had been contacted (9,537) and 84% of those contacted desired to opt in to our program (8,007) with only 16% opting out (1,530). This is an overwhelming response by our customer base that the service is valued and that our typical customers desires his or her overdraft service to remain the same. Asking this customer base to opt-in again makes absolutely no sense. The message would be that you Mr. or Ms. Customer are unable to manage your own financial affairs and it is obvious that you need assistance.
2. Also, these measures would add to the list of legal-ese our customers are tired of hearing. In most cases our customers say don't bother me with required "hazardous to your health" warnings and allow me to make my own decision about what I need.
3. We have observed that customers who are not allowed to deal with their accounts in the manner in which they please will migrate to the "check-cashing" companies for financial services where they are not "regulated to death".
4. We have observed that it is not only the financially un-sophisticated or lower income customers who utilize overdraft services. In fact, our customers who utilize our overdraft program cut across income categories and educational background and age ranges. They each have their own particular reason for choosing to utilize the program but share in their understanding it is their business and it is their choice.
5. We have for many years offered an alternative line of credit to customers who would overdraft and have found that many utilize the line and continue on into overdrafts on a regular basis.
6. The cost of originating a small loan is prohibitive for the size of the loan involved.
7. Monitoring the daily use of overdrafts and contacting customers who are "abusing" the privilege is much too cumbersome and moreover, many customers do not wish to be contacted.

In summary, we believe adequate initial disclosures about our overdraft fees and the opportunity to opt in for debit card and ATM overdrafts, as well as seeing overdraft fees prominently displayed on the customer bank statement are quite sufficient for our bank customers to understand our overdraft program.

We do not believe we, or the FDIC, should be making judgments about how our customers manage their bank accounts.

Respectfully,

Ray Stipp
President
Community Bank & Trust
417 451 1040
417 389 1278 (cell)
rstipp@cbthomebank.com

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From: Site Administrator [web@responsiblelending.org] on behalf of
Brenda Mabbitt [bam5092@yahoo.com]
Sent: Monday, September 13, 2010 9:46 PM
To: Overdraft Comments
Subject: Stop unfair and abusive debit-card overdraft fees

Sep 13, 2010

Ms Sheila Bair

Dear Ms Bair,

I support the FDIC's recommendations that banks address deceptive unfair debit-card overdraft practices used to maximize the fees they charge customers.

As someone who was surprised by very high fees for small purchases, I wholeheartedly agree with the FDIC's proposals and hope that the other banking agencies will follow suit.

The banks should hear as often as possible that customers want overdraft coverage that is fair and reasonable. I hope that they listen and make the changes outlined in your guidance. Providing customers with a responsible product is not only right thing to do--it's good business.

It is only out of necessity that I even have a savings account. I refuse to open another checking account until there is true reform in the banking industry and we no longer have to worry about being surprised by overdraft fees.

Sincerely,

Ms. Brenda Mabbitt
PO Box 154
Dania Beach, FL 33004-0154
(954) 639-3540

From: Site Administrator [web@responsiblelending.org] on behalf of
Alison Shuman [alintx@yahoo.com]
Sent: Monday, September 13, 2010 9:46 PM
To: Overdraft Comments
Subject: Stop unfair and abusive debit-card overdraft fees

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Dear Ms Bair,

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I have argued over and over with my bank [*Name of Institution*] that they should deny transactions when my balance is low. Instead, they refuse and a \$2 get well soon card can cost \$22, or \$35 or more. This isn't reasonable. They do this intentionally, and the charges are outrageous! Usurious, actually.

Sincerely,

Ms. Alison Shuman
11005 Country Knls
Austin, TX 78750-3437