

**From:** "Mona Swann" <mswann@CCBank.Net> on 06/10/2004 03:31:22 PM

**Subject:** Overdraft Protection Programs

Dear Sirs:

In response to your request for comments on the "Overdraft Protection Guidance", I think the charge off period of 30 days is too short. In many cases the overdraft limit may accumulate over a period of 30 days and those who are paid monthly would need more time than 30 days to cover their overdraft. From a practical and operational stand point, 60 days would be more appropriate. The additional days would also give the bank time to collect the overdraft and get the customer in good standing rather than having them inconvenienced by closing their account only to have to re-open at another institution, change insurance drafts, ACH items, etc.

While overdrafts are nothing new to the financial industry, the organized overdraft program provides many benefits to the consumer. By having overdraft protection, the consumer is not embarrassed or inconvenienced by having their debit card rejected at the point of sale, or faced with having a check returned NSF and being charged a fee both by the bank and by the merchant to which it was returned.

The overdraft protection program is an alternative to the very popular "check cashing places" springing up on every corner, where customers receive no financial counseling or alternative to get their finances or cash flow in order.

Obviously, some customers can and will use the convenience of overdraft protection as it is intended, while others abuse the privilege, sometimes to their detriment and expense, in which case they should be cancelled or suspended based on the financial expertise of the institution.

Other aspects of the proposed guidance seem to be practical and reasonable and if followed will provide a great benefit to the customers.

Dennis M. Walker,  
PRESIDENT & C.E.O.