



June 4, 2004

Docket No. OP-1198

Board of Governors of the Federal Reserve System
Attention: Jennifer J. Johnson, Secretary
20th Street and Constitution Avenue, NW
Washington, DC 20551

Gentlemen:

We have reviewed the proposed guidelines for Overdraft Protection Programs as issued by the Office of Thrift Supervision (No. 2004-30).

For the most part, the regulation seems to be reasonable. Most of the recommendations are common customer service issues, many of which we already have in place and would require little or no change at our institution.

We do recognize that the recommendation to monitor individual usage would require some system changes and would increase the amount of time spent in administering the program.

The recommendation to "Consider daily limits" is a concern to us. There is no such restriction for customer accounts if the withdrawal items are returned to the payee. The number of debits which result in account overdrafts is controlled by the customer. We do not see any reason to show partiality to the customer for whom we are doing a service by paying the checks, when the customer who opts out of the program will pay a fee for each and every overdraft.

Please take these comments under consideration as you plan the final version of the guidance document.

Thank you.

Yours truly,

A handwritten signature in cursive script that reads "Brenda Brown".

Brenda Brown
First Vice President/Operations

bb

cc:
Federal Deposit Insurance Corporation
550 17th Street Building
Washington, DC 20429