

From: Randall Senn  
Subject: Electronic Fund Transfers

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Comments:

Sirs:

The default condition should be that the bank rejects ATM, debit card, and EFT withdrawal attempts.

Allow consumers to opt in, if the terms and costs are stated.

If the bank later wants to change the terms and costs a new opt in should be required.

If the bank wants to have the terms be a fee of "up to \$1000", but forebears on all but a \$25 fee, then the \$25 fee is really the baseline. If the bank wants to start charging \$30, a new opt in should be required.

Basically, anytime that a term or condition or practice changes that could ever be adverse to the consumer, a new opt in should be required.

Sincerely,

Randall Senn