

From: Paul Brewer
Subject: Electronic Fund Transfers

Comments:

To whom it may concern,

I have read over the summary of all rule changes for credit card and overdraft services that have been recently proposed by the Fed. I believe all of them (in AA, DD, E, and Z) will improve the banking industry and will give consumers important protections or controls over their accounts. I hope to see all of the proposed changes approved. In regard to the regulation E proposed rule change, I feel strongly that it would be better to implement the "Opt-In" amendment in regard to consumer choice regarding overdraft services. I do not feel that credit card and banking corporations can be trusted to provide adequate "opt-out" choices ("reasonable opportunity" in the proposal) as the institutions rarely make anything easy unless it rewards them financially or is specifically required of them. It is natural for an account to not be able to be overdrawn and studies show that most consumers do not expect that they can overdraw their accounts. Therefore, it would be sensible for no overdraft services to be the default of all new account and for the an opt-in needing to be specified by the consumer.

Further, I think that card companies and similar institutions should give the option of asking consumers (at point of service) if they wish to overdraw their account. That is, if the consumer has already opted in to overdraft services a message should still appear (similar to the "Card Rejected" message that appears when a card cannot be charged) and ask the consumer to verify that they would indeed like to overdraw their account at that time.

Thank you for your service to our government.

Sincerely,
Paul Brewer