

From: Patsy Ryan, Louisville, KY
Subject: Electronic Fund Transfers

Comments:

Board of Governors of Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Dear Federal Reserve Board Director:

Just before Christmas 2007, I found out just how scrooge-like the banking industry (in this case PNC Bank) can be. Here's my story. I have been paying my creditors through on-line account access for several years. In December 2007, I had a raging episode of the flu, but had to pay my bills. I made a mistake, hit the wrong calendar date, and scheduled a payment for a week earlier than I intended. I can't remember exactly how much I was short (I do know it was less than \$100). Then it started, I was clearing my bill payment activity in my checking account and found \$367(+/-) in overdraft and NSF charges. There were 10 such charges to my account, all attached to a string of debit card transactions (which cleared the same evening as the error). Yup, PNC Bank paid 1 large payment and bounced the debit transactions (they went by the date of the transaction-not the date they cleared). When I inquired for some type of review/assistance, I was told "sorry, but you've had your 1/account life-time fee waiver. Since I've been a PNC customer for over 20 years, it surprised me that 1; there was a limit on this type of customer service and 2; that PNC basically could care less that this mistake had created a major impact on my life and my son's (and right at Christmas no less). (I'm not just whining here...my paycheck was approximately \$800/bi-monthly, so these fees ate up almost half of my two week salary). I'm not a deadbeat. I pay my bills and am learning some hard financial lessons very late in life. But, here's my feeling: 1) what ever happened to the customer service call to advise you of the potential OD situation. Had this simple call, or even an e-mail, been made I would have been aware of the shortfall and been able to take action to correct it immediately. I could have taken some action---but, I didn't know it had occurred until a couple of days later...and the mailed notices did not start coming in until after I had found out on my own. 2) If I had known, I could probably have found the shortage from another source. Heck, I could have even gone to the local, so called "predatory pay-day lender", borrowed the \$100, cover the OD and pay the \$25 interest on the loan and still be ahead. I've worked with businesses and I know folks with money...in both instances, I know first hand that they receive customer courtesy calls when something like this occurs. I believe there is a different level of service for those with and those without. The pain of it all is that I'm STILL a PNC customer and for exactly the reason I believed I should have been treated with more respect...that 20+ year banking relationship. ...Oh, and here's the kicker, my paycheck was direct deposited within 48 hours of this mess...\$367 for less than \$100 for less than 48 hours...Perhaps

we need to be calling PNC "Predator". I've been wanting to tell this story for a long time. I'm telling it without the benefit of my records in front of me because if I put it off, I may not follow-thru...and I believe there are so many more folks like me who need this type banking regulation.

I support the proposed requirement that would require financial institutions to obtain consumers' affirmative consent (or opt-in) before any overdraft fees or charges may be imposed on consumers' accounts.

Banks should get explicit permission before enrolling customers in the most expensive overdraft system, automatically covering overdrafts and charging high fees, and should be stopped from using unfair practices to increase their overdraft fees.

Sincerely,

Patsy Ryan
Louisville, KY 40208