

From: Peoples Bank, Al Vermeer

Subject: Electronic Fund Transfers

Comments:

Dear Sir/Madam:

I would like to comment on the proposal to require an opt-in or opt-out from customers before assessing an overdraft fee caused by a transaction at an ATM or debit card transaction. An overdraft fee is and always has been a totally avoidable fee. Customers should be in control of their own finances. We provide many avenues for them to have access to their financial information such as telephone banking, online banking, ATM access, and customer service representatives. If customers track their own transactions, there is no reason for them to ever pay an overdraft fee. Requiring our Bank to offer and track either opt-in or opt-out notices would only add to our cost of operations and eventually raise fees for all customers, not just those who may (or may not) benefit from this change.

An ATM is a great example of this. A customer has the option to check their balance at an ATM prior to requesting any cash. We only report the customer's ledger balance at an ATM, not their available balance including any overdraft privilege or protection lines. They can know exactly how much they can withdraw without receiving a fee. If they choose to receive cash above their available balance, a fee should be charged for this added convenience.

Finally, we offer other lower cost methods of avoiding overdrafts including overdraft protection lines of credit, credit cards and sweeps between accounts. Any of these can be, and are, used by qualifying customers on a regular basis with costs ranging from a few cents to \$10 per transaction.

We are a community bank and we realize that we only benefit when our customers prosper. We have no desire to gouge our customers with fees. However, I also strongly feel that regulations should not take the place of personal responsibility.

Thank you for your consideration in this matter.

Al Vermeer
Peoples Bank
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