

From: Barry Bickle  
Subject: Electronic Fund Transfers

---

Comments:

Thank you for the opportunity to comment on the proposed amendments to Regulation E. For reference Eastman National Bank is a \$160,000,000 locally owned community bank with three branches in northern Oklahoma.

"Right to Partially Opt-Out or Partially Opt-In vs. Required Opt-In". We have no problem with most of the Proposal's opt-out provisions, but oppose the opt-in requirement for the following reasons: increase cost to all banks; represents an unfair administrative burden; not aware of consumer demand for it; no offsetting value for consumers.

"Partial Opt-Out". We believe this proposal is too cumbersome to work. It would require us to make costly technology changes and adds compliance burdens. Small community banks like ours without large computer staff would be a definite competitive disadvantage to larger banks.

"Exceptions to Opt-Out Requirements". Implementing the necessary technology changes to comply with the complicated safe harbor rule will be cost prohibitive for small banks like us. If implemented, we would request additional time to acquire the needed information systems.

"Debit Holds". Similar to the Exceptions comment above, we support the concept but believe implementing the system changes necessary to comply will be very costly. Hopefully some implementation period will be allowed so we can purchase and implement these computer changes.