

From: Peter P Mackin
Subject: Reg E - Electronic Fund Transfer

Comments:

Date: Mar 24, 2010

Proposal: Regulation E - Electronic Fund Transfer
Document ID: R-1343
Document Version: 2
Release Date: 02/19/2010
Name: Peter P Mackin
Affiliation:
Category of Affiliation: Government
Address:

City:
State:
Country: UNITED STATES
Zip:
PostalCode:

Comments:

The current overdraft fee rules funnel money directly from the most financially vulnerable Americans to the most financially suspect CEO's. Gearing these financial rules to target senior citizens, U.S. veterans, and others in the low to middle-class income bracket is both immoral and appalling. Sources say billions of dollars is being taken out of the Average consumer economy and put directly into the pockets of these big firms. In particular, every average American has been taught to keep track of their checks and debits chronologically. However, companies such as Wells Fargo organize them by value (largest first to smallest) ensuring that overdraft charges to the customer will be maximized. Also, deposit can take several days to a week to clear (even cash deposit can be pending in some circumstances), yet debits and charges are always immediate. For example, if a person makes numerous charges of \$5, \$10, \$15 on a Friday during their lunch hour; then they write a rent check for \$400 after work and deposit their paycheck on the same day; their paycheck will be pending through the weekend, their rent check will post prior to the smaller charges (even though it occurred later in the chronological order) and then every small transaction will incur a \$35 fee. When the paycheck finally posts, most of it will go to the bank for overdraft fees. The people that routinely encounter problems similar to these are not usually check kitters or criminals. They are also not always irresponsible people who aren't keeping track of their money. They are average, hard working Americans who were trained to do basic accounting one way their whole lives, to find that these overdraft rules take advantage of their tendencies. These practices are predatory and especially appalling knowing that these same citizens paid their tax dollars (and eventually will pay more through inflation) to bail out these same banks which are now exploiting them through their subterfuge. Most Americans don't know about T-Bills or FZM or other most of the other financial jargon discussed

at the Federal Reserve level. However, they do understand when they are being shammed out of their hard earned money - or when their grandmother is broke from fees - or a disabled Iraqi veteran can't pay for rent because of banking rules; I guarantee you that these stories will start reaching the public. Please restore justice into the financial system. Thank you for your valuable time and service.