

Subject: Regulation AA

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Comments:

Credit card companies which charge a set-up fee than an annually fee, then a monthly service fee for credit card with extremely low limits like \$350 minus the fees (\$235.00 in most cases) seem like a scam more than a true credit policy. credit card limits for such cards if allowed at all should be 3 to 4 times the fees charged, or don't offer the credit card. Banks policies of charging NSF fees on accounts which a debit pre-authorization is holding funds should cease.

Personally I've had hotels pre-authorize my debit card \$600.00 only to submit a actual charge of \$39.00 after the stay. In the mean time my bank held the \$600.00 in funds and over drafted my account 10 times at \$36.00 each (\$360.00) Any debit hold policy should be limited, and be written to allow a first debit arrival to be paid basis regardless of the debit pre-authorization and NSF charges should only occur after the pre-authorization is physical processed by the bank for the actual amount of the charge. The retailer should be required to pay the NSF fees as a penalty for their excessive authorization amount policies. Merchants pre-authorizing excessive amounts is un-needed. Many laws cover merchants, if a hotel guest skips out it's a crime, if the shopper takes a item with out paying its shopiffting so why allow

pre-authorization in excess of the actual balance due. One night stay authorized nightly would make more sense that the entire stay authored at once. Stay 7 days at \$200.00 per night is a \$ 1400.00 pre-authorization. charge my account daily for the actual service used, bank are allowing their merchant account to also abuse the holding of funds balance game. Harrah's entertainment holds an estimated \$500 million per day with way, on Comp hotel rooms and their are only one of hundreds of merchant playing the holding funds game! Interest rates charged to any consumer should limited to a maximum of 10% over prime rate. Credit card companies depending on the State charge as high as 29%. Since when is a 29% return considered the norm. Wall street averages 10% on most stocks if we're lucky. Monthly service fees coupled with an annualy fee seem like double dipping for the credit card companies. \$72.00 annual fee plus \$7.00 monthly service fee, adds up to \$159.00 annually on a \$300.00 limit credit card, sound more like loan sharking than a fair policy. If a credit card company stops extending credit to a consumer because of missed payment(s) a reasonable late fee up to the day the creditor cuts off credit maybe reasonable, but 18 months after is excessive, than if the late fees cause an over limit to charge an over limit charge too. This practice is double dipping and totally excessive. Credit card companies should be limit in the number of months they can charge lates and over limit fees (3-4 months maximum)on all closed accounts. My bank had large sign up announcing electronic banking was how the norm. No longer would it take 3 to 10 days for a check I wrote to clear the bank, debits would electronically be out of my account possibly the next day after writting the check. A deposit which is also a check should also clear their account the same matter. So why should the banks be allowed to hold deposited funds 3 to 10 days before it becomes available?. Greed is the only answer \$100 billion in 3 day holds equals alot of interest (\$6 billion per year), where my share for the bank holding my funds, it only fair. Hold my funds pay me interst, just like the interest earned by my bank on their Billions in standing balances from consumer held funds!