

Subject: Regulation AA

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Comments:

I believe these regulations are long overdue. As we migrate to a cashless society, we will need consumer protections as banks continue to merge and compete on service less. There are numerous deceptive practices that seem to be common to many banks and these can pose a tremendous financial burden. National City, as an example, refuses to refund overdraft fees and claims to have no way of preventing (NSF) fees nor is there any limit to the damages even if they were the result of fraud. The additional process of posting debits ahead of credits (regardless of actual time of transaction) and not making information available on an instant basis compounds the issue. For example, if I have \$100 in my checking account and I spend (using my debit card) \$50 on gas, \$2 on a snack inside and \$3 on a movie rental, I should have \$45 remaining. However, if someone posts a fraudulent charge of \$51 before I start, I will not know until the next day. At that time, I will find out that I have fraud and \$102 (\$34 x 3) in overdraft fees. It is a painful process to deal with simple retailer mistakes and it is possible (and frequently happens) that the banks tack on usurious fees and claim that they can't do anything and do not refund charges while they provide no way of defending against these

charges. I would actually settle for some reasonable limit on overdraft fee. In an automated system, I do not see how allowing the payment (which has no human review) comes to a \$34 overdraft fee for a \$2 purchase, doubly so when the overdraft is corrected within hours.