

info@hadv.org on 06/20/2008 12:20:03 PM

**Subject:** Regulation AA

Board of Governors of Federal Reserve System  
20th Street and Constitution Avenue, NW  
Washington, DC 20551

Dear Federal Reserve Board Director,

New rules would not require banks to obtain consent from customers before enrolling them in their most expensive option for covering overdrafts, but would only allow them to opt out of the program after the fact. Consumers should not have to ?unsubscribe? from this costly system.

Under prevailing practices, banks can intentionally maximize the overdraft fees you pay by automatically approving debit card purchases that throw your account balance into the negative and by manipulating their debit-clearing systems. At the least, the Fed should make them get your approval before charging you these fees, which now average \$34 per incident.

As an advocate for a community development agency in Philadelphia, I often see clients who have had wealth stripped from their accounts by late fees compounded by overdraft fees. This is a severely under-regulated portion of the banking industry, and one that disproportionately impacts the most vulnerable of citizens.

I urge you to require banks to secure prior authorization from customers before enrolling them in overdraft programs, and to make clear and full disclosure to customers of all fees and charges, in plain English, in advance.

Sincerely,  
Marcus Saitschenko  
1528 Walnut Street  
Suite 1000  
Philadelphia, PA 19102