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Bedford Loan & Deposit Bank

August 05, 2008

Ms Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

RE: FRB Docket No. R-1314

Dear Ms Johnson,

Thank you for the opportunity to respond to the proposed comments published at 73 FR 28904, regarding overdraft protection programs.

Our customers find overdraft protection to be beneficial. These voluntary programs can protect the customer against having an important payment (rent, mortgage, utilities) returned in the case of an involuntary overdraft. Overdraft protection can also allow the customer to avoid merchant return check charges and/or multiple merchant return check charges. Given the significant increase in debit card usage, and the increasing complexity of the financial payment system, a partial opt out for ATM and debit transactions is simply not feasible and would penalize those paying rent, mortgage payments, utilities, etc. through recurring automatic debits. Taking away voluntary overdraft programs would be doing our customers a disservice.

Yours truly,

John N. Manning
President

JNM:jcd