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July 21, 2008

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
Reference: FRB Docket No. R-1314

Dear Ms. Johnson:

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

First of all, overdraft protection programs are a convenience product offered by financial institutions to their customers. Most customers generally have voluntarily taken advantage of the program in order to keep necessary payments (such as mortgage, car payments, utilities, medical aid, and in today's world, gasoline purchases) on time. Use of any overdraft protection service is voluntary regardless of whether it is an opt in or opt out program, because the use of the program is totally within the customer's control. The customer can totally avoid the program by not overdrawing their account, which can be easily done by simple management of their account. And those who do find themselves in an occasional position of being "short" on cash when the rent is due, have frequently expressed their appreciation that an overdraft protection program exists. I can recite one instance in particular when a customer had to go to the emergency room at a local hospital, and we were able to cover a check that allowed her to pay her bill. She called to thank us for the service.

The proposals suggest that a customer be allowed to opt out of overdraft protection programs all together or, perhaps, to be allowed to select a partial opt out for ATM and debit transactions. This, however, is not feasible given the complexity of the payment system currently used for account transactions and is unfair to those customers who might pay their most important bills—like utilities and rent—through recurring debits. Debit cards are no longer just used at a point of purchase. In fact, in 2007 the use of debit card transactions exceeded those of credit cards. The proposal is offering a complicated scheme that could inadvertently do the most harm to those customers who need the help the most and who might misunderstand the various opt out options.

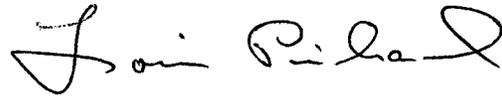
The payment system in the United states has become increasingly complicated as the transactions of customers have become more complicated, as technology has become more sophisticated, and as consumers have become more savvy and demanding with regard to the

way their finances are handled. Establishing rigid rules to determine when, and in what order, payments are applied to accounts is impractical and perhaps impossible in this kind of market.

In 2005, best practices were issued by the primary federal banking regulators on overdraft protection programs. The vast majority of financial institutions offering overdraft protection have complied with these best practices guidelines. The guidelines have worked; the customers are satisfied with the product. I have never received one call to complain about having this overdraft protection.

Thank you for the opportunity to comment. We are adamantly opposed to the proposed regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Prichard". The signature is fluid and cursive, with a large initial "L" and a long, sweeping tail.

Louis Prichard
President, CEO

LP:hc