

City
NATIONAL BANK
of West Virginia

Charles R. Hageboeck, Ph.D. ♦ President and Chief Executive Officer

July 22, 2008

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 referenced above, which were published at 73 FR 28904, regarding overdraft protection programs. The following are comments to general categories included in the proposal.

City National Bank's overdraft protection program is a convenience product offered to its customers. Many of City's customers have taken voluntarily advantage of our program in order to keep necessary payments (such as mortgage, vehicle, and insurance payments) 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 depositors' control. The customer can totally avoid the program by not overdraw their account, which can be easily done by simple management of their checking account. As a matter of fact, over 80 percent of City's customers never overdraw their accounts. And, those who 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 have enclosed a copy of a letter from the Wyman family expressing just such appreciation.

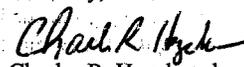
The proposals suggest that a customer be allowed to opt out of overdraft protection programs all together or, perhaps, to be allowed to select a partial opt out for ATM and debit card transactions. This, however, is not feasible given the complexity of the payment system currently used for account transactions and is unfair to those customers who might pay their most important bills – like utilities and rent – through recurring debit card transactions. Debit cards are no longer just used at a point of purchase. 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 the consumers have become more savvy and demanding with regard to the way their finances are handled. Established rigid rules determining 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, as has City National Bank. The guidelines have worked; the customers are satisfied with the product.

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

Sincerely,


Charles R. Hageboeck
President & CEO

June 26, 2008

To whom it may concern:

Our family has banked with City National for eleven years; two of our children opened their first checking accounts at the Beaver branch. During this time, we have moved 6 times, including a move from West Virginia to New York. City National has always been there for us, every step of the way, including the day that I needed to cash a check for over \$500, to pay for the moving van.

City National Bank's outstanding customer service is made evident in many ways, starting with drive-thru hours that I've not seen matched anywhere. Our current New York bank has no drive thru, and is open only from 8:30 to 4:00; they are not open on Saturdays, either.

The unfailing cheerfulness and courtesy of everyone with whom we deal at the Beaver branch makes long-distance banking so pleasant and non-stressful. We know that this attitude starts at the top, with the branch manager, and filters down. Clint has hired and continues to hire quality people, and it shows.

City National's generous overdraft protection has truly been a Godsend to us this year. Thru a series of unfortunate events, two of our children found themselves in California in a bad work situation. By carefully using our overdrafts, we were able to obtain plane tickets, and fly them home quickly. Without this feature, there is no way we could have done this.

I particularly want to single out Clint, the Beaver branch manager, for his professionalism, concern for his customers, and his willingness to go above and beyond for our family. We have basic free checking - it's not as though we're making the bank oodles of money (chuckle). Let me tell you some of the things that Clint has done for us.

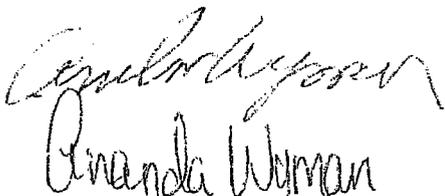
He obtained new debit cards for us, and activated them, when we accidentally let them lapse. Last year my husband changed jobs and initiated direct deposit to City National. Unfortunately, the company that does the payroll made an error when they entered the account number, which meant that the money was floating around in cyber-space. Clint took the time to help us track down the problem, and get things going properly. When the same payroll company was 2 days late making the deposits, Clint reversed the overdraft fee we incurred on our rent check.

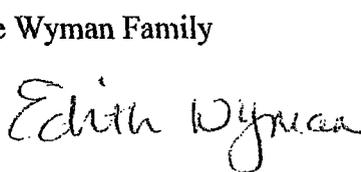
In addition to our City National accounts, we have had accounts at 8 other banks. Over the long term, only one has even come close to approaching the kind of superior service we get from City National. That is why both of my husband's direct deposits will remain there.

We hope one day to return to West Virginia. When we do, I know we will have the joy and reassurance of knowing that our "hometown bank with world-class service" will be waiting for us!

With sincere thanks,

The Wyman Family


Amanda Wyman

 Edith Wyman

 Sarah Wyman