

Subject: Regulation AA

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Comments:

These proposed regulations are too unweildly for a small institution such as ours, and will be far too expensive to implement. Following the timing of debit holds, for example, would be a manual process. Sending opt-out notices each statement period when overdraft fees are assessed would be a software programming expense, as well as a printing/paper expense. We agree we need to be fair to our members and clearly inform them of all the rules of the overdraft program, but feel a good disclosure with opt out procedures at account opening, along with the opportunity to opt out upon request any time in the future, is sufficient and fair.