

"Robert Epling" - 08/01/2008 11:05:09 AM

**Subject:** Regulation AA

Robert Epling  
Homestead, FL 33033-2437

August 1, 2008

Jennifer Johnson  
Board of Governors of the Federal Reserve System  
20th St. and Constitution Ave. N.W.  
Washington, DC 20551

Dear Jennifer Johnson:

RE: Proposed Regulations To Overdraft Protection Programs

We are writing in opposition to the above referenced proposed Regulations.

Our bank has administered an overdraft protection program for more than six years. It is an invaluable program to many of our customers. With many of our offices in low income areas, nearly 30% of our consumer customer base utilize the service at least once annually.

The specifics of the proposal relating to ATM's and debit card transactions is not technically feasible and could negatively affect customers.

Our current comprehension of the proposal reflects complexities which are not advantageous to the customers.

We employ a "Fresh Start" program and have received many "Thank You" letters for saving customers money and the embarrassment of a returned payment.

Please consider what the customer needs and wants.

Sincerely,

Robert L. Epling