



# Armstrong Bank

August 4, 2008

Via electronic delivery

Jennifer J. Johnson  
Secretary  
Board of Governors of the Federal  
Reserve System  
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Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, NW  
Washington DC 20552

Re: BOARD Docket No. R-1314; OTS Docket No. OTS-2008-0004; Unfair or Deceptive Acts or Practices; 73 *Federal Register* 28904; May 19, 2008 (UDAP Proposal)

Ladies and Gentlemen:

I am writing in opposition to the above-referenced proposal involving overdraft protection service fees.

The majority of consumers avoid overdraft fees using basic account management skills. Banks already offer sufficient overdraft options for consumers who need such services. Advance notice and opt-out requirements would be burdensome to banks and would not alleviate the need for overdraft services.

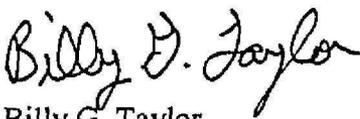
Allowing a partial opt-out of ATM and debit card transactions, while retaining coverage for checks and ACH, is not technically feasible under current bank processing systems. In addition, customers using debit cards for recurring payments would be adversely affected by such opt-out.

The proposed requirement for debit holds is an issue that should be addressed by merchants and card networks. It is far too complicated for banks to implement or for customers to understand.

Concerning payment clearance processing and the order of recognizing payments, it would be impossible to manage accounts if customers were allowed to choose an alternative payment processing order.

The proposed rule on overdraft fees would result in excessive requirements for banks and would have a negative impact on the consumers the rule is attempting to assist. Therefore, I request that the proposed rule be denied.

Sincerely,



Billy G. Taylor  
President/CEO



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