

**Subject:** Regulation AA

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**Proposal:** Regulation AA - Unfair or Deceptive Acts or Practices

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**Comments:**

I favor a minimum of regulation, but I think that it is badly needed in this case. I can always take my business elsewhere, but without full and proper disclosure customers can be bullied into paying unjust fees. As of April 1, 2008, Bank of America started charging overdraft charges even when the ledger balance is positive. The justification is that the "authorization balance" is negative. This is problematic for two reasons. They do not document the "authorization balance"; and in many instances (as in hotel and rental car authorizations) the actual charge is less than the authorization amount. Neither online activity nor monthly statements show the authorization balance. When I contacted customer service, they failed to document that my either my ledger or authorization balance was ever negative (at least until they deducted fees). The fees ultimately totaled more than \$500 in \$35 fees.