

From: PBK Bank, Brenda G Baker
Subject: Electronic Fund Transfers

Comments:

Date: Mar 30, 2009

Proposal: Regulation E - Electronic Fund Transfers

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Category of Affiliation: Commercial

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City:

State:

Country:

Zip:

PostalCode:

Comments:

Docket No. R-1343 Dear Sirs, Thank you for the opportunity to comment on the proposed amendments to Regulation E, as they relate to overdraft protection. PBK Bank is a \$118 million bank located in xxxx. We have 6 offices and we do offer an overdraft protection plan to our customers. I feel you are imposing a burden on banks to determine if the transaction is ATM and/or POS or another type of transaction. Banks will have to manually research this to know if we can assess a NSF fee.

This would be almost operationally impossible unless core processors could do this for us. I am very much opposed to any requirement that differentiates ATM and POS transactions from other transactions to the customer's account. What has happened to consumer's responsibilities to manage their accounts--balancing their statements.

Customers don't want to pay the fees but do want the advantage of having their debits paid versus being returned for insufficient funds. People make choices about whether to balance their statement or just call the bank to see how much is "in their account". Bank's should not have to be responsible for a customer's bad choice in money management. Our customers with overdraft protection have an expectation of being able to access their funds at ATMs and POS locations. To remove that access will result in customer complaints and inconveniences because most customers didn't read the notice or did not understand it applied to their account. I appreciate the opportunity to comment on this proposed amendment and would urge you to decline the proposals.

Sincerely,

Brenda Baker