

From: NRCS Federal Credit Union, Pat Brown
Subject: Reg E - Electronic Fund Transfer

Comments:

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Proposal: Regulation E - Electronic Fund Transfer
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Comments:

Please consider modifying the revision of 205.17(b)(4) to exclude institutions that BOTH do not have a formal overdraft program and have a policy and practice of declining to authorize and pay any ATM or one-time debit card transactions when the institution has a reasonable belief at the time of the authorization request that the consumer does not have sufficient funds available to cover the transaction from the prohibition on assessing overdraft fees under 205.17(b)(1). Being a small credit union this will limit our ability to offer debit cards to our responsible members.