

From: Lowland Credit Union, Linda Marshall
Subject: Reg E - Electronic Fund Transfer

Comments:

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Proposal: Regulation E - Electronic Fund Transfer
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Comments:

I have reviewed many of the comments regarding this regulation and agree with the many who have questioned the point that why should regulators support the bad habits of consumers who show total disregard to keeping up with their checking account balances. It does show preferential treatment to those consumers over the conscientious consumers. We do not have an overdraft privilege program but we do have some members who have overdraft options from other savings accounts or lines of credit for which we do not charge a fee. However, there is one issue such as the transactions at gas pumps, hotels, restaurants, etc. for which authorizations are obtained for \$1 or in case of restaurants, the authorization is for the tab before tip is added. When these transactions actually clear, we are mandated by VISA rules to pay those. There is no choice available to return them. Additionally, to offer service to our members, we all allow stand-in limits at ATMs for when when a system and down and a balance cannot be determined. We would charge a negative balance fee to pay these transactions but under the new rule, we would have to get opt-in permission before we could charge. If the transaction is going to have to be honored anyway, why would anyone choose to opt-in for a fee when someone who has not chosen an opt-in would get the item honored and no fee. Where is the fairness in that. After reading many of the comments, I urge serious consideration be given to the comments as clearly, this was not evaluated thoroughly or with input from those folks knowledgeable about routine day to day situations.