



Empire Justice Center

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May 7, 2013

Department of the Treasury
Office of the Comptroller of the Currency
Attn: 1557-0081
By email to regs.comments@occ.treas.gov

Federal Reserve System
Re: Consolidated Reports of Condition and Income, FFIEC 031 & 041
By email to regs.comments@federalreserve.gov

Federal Deposit Insurance Corp.
Re: Consolidated Reports of Condition and Income, 3064-0052
By email to comments@fdic.gov

Re: Consolidated Reports of Condition and Income (OCC Attn: 1557-0081; Fed: FFIEC 031 & 041; FRB: 3064-0052)

Dear Sir or Madam:

We are writing to support the proposal to collect data on consumer deposit account balances; on service, overdraft and ATM fees; and on remittance transfers. Overdraft fees in particular have been the source of terrible practices that have harmed consumers. Bank regulators need to be able to identify the scope of the problem and the banks that engage in abusive practices. All of the data proposed to be collected is essential to protect consumers and to ensure the safety and soundness of banks. Data on fees should be collected from all banks. Overdependence on problematic fees can be a bigger problem for smaller institutions.

Sincerely,

Ruhi Maker, Esq.
Senior Attorney