



CSBS

# InBOX

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## Thompson Concerned with FDIC Overdraft Protection Guidance

In response to numerous comments and questions received regarding the FDIC's final guidance addressing the risks associated with overdraft payment programs (the "Overdraft Guidance"), Commissioner Thompson submitted his position on the matter to FDIC Chairman Sheila Bair.

In his letter to Bair, Thompson pointed out that the Overdraft Guidance goes beyond the requirements of the Reg E Amendments, and while the Overdraft Guidance is neither statutory nor regulatory "law," its terms indicate that it will be enforced as such.

Thompson stated that he believes that if an institution's overdraft program is in compliance with the Reg E Amendments and does not include unfair and deceptive practices, it should not subject the institution to enforcement action.

Thompson said he agrees with the philosophy of eliminating abusive features of all consumer banking products. However, because the United States system of banking supervision allows for multiple charter types and a choice of regulators, supervision by one regulator that creates an **uneven regulatory environment** should be avoided.

## Elizabeth Warren Addresses State Supervisors

Elizabeth Warren, Assistant to the President and Special Advisor to the Secretary of the Treasury on the Consumer Financial Protection Bureau, spoke to attendees at a reception hosted by Commissioner Thompson during the CSBS Supervisors Symposium earlier this month.

In her remarks, Warren spoke of the mission of the Consumer Financial Protection Bureau (CFPB), the challenges the agency faces, and of the need for enhanced coordination among state and federal regulators to protect consumers of all financial services products. She hailed efforts by the states to protect consumers and enhance financial supervision. Warren also answered questions from state regulators.

Warren was accompanied by Peggy Twohig, who will lead supervision of non-depository institutions for the CFPB, and by former Massachusetts Commissioner Steve Antonakes, who will lead supervision of depository institutions at the CFPB.



Pictured above are CSBS Chairman and Iowa Superintendent Tom Gronstal, CSBS Chairman Emeritus and Oklahoma Commissioner Mick Thompson, Elizabeth Warren, and CSBS President and CEO Neil Milner.