

Robert C. Mazzi  
23 Bidwell Parkway  
Buffalo, New York 14222  
(716) 886-5302  
October 15, 2007

To Whom It May Concern,

It is my understanding that your agency and others are requesting public comment and ideas on proposed new "guidance" for banks and credit unions on what to do when presented with a court "garnishment" order from a creditor.

Here are my thoughts:

- 1) Have banks offer special accounts which can only contain exempt funds that are protected by law against being frozen.
- 2) Close all legal loopholes that allow creditors to freeze accounts which contain only funds which are exempt from debt collectors.
- 3) Make creditors pay all costs associated with placing a freeze on a consumer's account regardless of what funds the account contains. Why should the bank's customer be penalized for an action they did not initiate?
- 4) If a creditor's collection efforts prove to be illegal, i.e. debts already discharged in bankruptcy, debts that do not meet statute of limitations timelines, and debts already paid at an earlier date, then creditor should be forced to pay the aggrieved individual double the amount of the fraudulent claim. This should be paid within 30 days or the creditor's accounts will be automatically frozen.

Thanks for the opportunity to voice my thoughts.

Sincerely,

Robert C. Mazzi