

**From:** "Roca, Art" <Art.Roca@ChasePaymentech.com> on 12/01/2006 09:40:02 AM

**Subject:** Electronic Fund Transfers

The Board is considering revising Regulation E to provide financial institutions relief from the requirement to make available terminal receipts at the time of a transaction for EFTs of \$15 or less. The Board requested comments to certain aspects of this rule change; including the proposed dollar amount of the threshold set forth in the proposed rule.

We would like the Board to consider a change to the proposed threshold amount from the proposed \$15 to \$25. Changing the threshold amount to \$25 will coincide with other payment card company rules and programs for small ticket transactions. This amount change would create a more consistent consumer experience, simplify merchant training with regard to rule changes, and minimize the number variables required by terminal programs to determine when to suppress receipt printing. Some legacy applications in use may have limited functionality with regarding to managing these receipt printing options. Additionally, the \$25 amount coincides with many corporate T&E expense policies whereby a receipt is not required for business expenses under \$25.

Thank you,

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