

From: Donna Ambrose  
Subject: Electronic Fund Transfers

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Comments:

Thanks for proposing guidelines on gift-card charges/fees. As a giver of gift cards, I hate paying \$6 or \$7 to the issuer for the privilege of buying one. As a recipient, it fries me to pay inactivity and transaction fees. The issuer already has the cash up-front - free use of the purchaser's money for however long the card goes unused until it expires. Why should they charge a fee for that? And for that matter, why should the card ever expire?? The answer is, the issuer should not be able to charge such fees, and the cards should never expire.

Card issuers can estimate the amount of cards that will never be redeemed for financial reporting purposes, so arguments against expiration dates are baseless.

Best of luck crafting guidelines useful to consumers and tolerable to issuers,

Donna Ambrose