

From: Thomas R. Burns
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Comments:

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Proposal: Regulation II - Debit Card Interchange Fees and Routing
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Name: Thomas R Burns
Affiliation:
Category of Affiliation:
Address:
City:
State:
Country:
Zip:
PostalCode:

Comments:

It is fairly obvious from reading some of the comments posted that many do not seem to understand how insignificant the current pricing of interchange is in comparison to the general economy. Let's take the high side of a 3% fee (gross profit) for a debit transaction. Now let's compare this to the free enterprise (gross profit) experienced by the retail trade such as jewelry, furniture and clothing - does a 100%-300% mark up sound familiar. If you do an actual comparison of the service provided by the processing networks, maintenance costs, actual transmission fees and recurring costs of CPU equipment, back up servers and other related fees without any guaranteed recurring revenue you will quickly realize that the % charged for these electronic transactions is minimal compared to the gross cost incurred by the processor. If the voices yelling the loudest would analyze their cost per transaction for a guaranteed payment they would quickly hear themselves becoming quiet. On the other hand if they want to go back to accepting checks -or no sale - chasing after the bad checks and ultimately incurring a much greater cost than 3% (high side) cost per transaction - then keep on yelling - if this passes as crafted you will see these debit cards dwindle once expiration comes about and you will be right back to where you were in the 60's. Now you make the choice!