



December 21, 2009

Jennifer L. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th and C Streets, N.W.
Washington, D.C. 20551

RE: Docket No. R-1377

Dear Ms. Johnson:

This letter is submitted by MetaBank dba Meta Payment Systems (“MetaBank”) to comment on the rules proposed by the Federal Reserve Board of Governors (“Board”) to Regulation E, which implements the Electronic Fund Transfer Act (“EFTA”) and its proposed rulemaking regarding gift certificates, store gift cards and general-use prepaid cards as published in the Federal Register on Nov. 20, 2009, at 74 *Fed. Reg.* 60986-61012 (the “Proposed Rules”) in light of the passage of the Credit Card Accountability Responsibility and Disclosure Act of 2009 (“Credit CARD Act”).

MetaBank is an issuer of prepaid card products including gift cards, and also provides a turnkey national branded (“open loop”) prepaid card solution that includes gift and reloadable card products to financial institutions and other merchants who desire to offer a prepaid solution to their customers (“consumers”).

The Board has requested comment on various proposed revisions to Regulation E. Based upon MetaBank’s significant experience in the payment system’s industry, it identifies the following issues and forwards the following comments regarding:

1. Grandfathering of Unpurchased Card Stock
2. Funds Expiration Issues
3. Exemption Issues
4. Escheatment Issues
5. Periodic Fee Issues
6. Disclosures Issues

MetaBank appreciates the opportunity to comment on the Proposed Rules and respectfully requests that the Board consider integrating/adopting the suggestions set forth herein. This letter provides MetaBank’s comments to the Proposed Rules as well as further requests for additional clarification based upon the Proposed Rules.

bringing money to LIFE



1. Recommendations of Grandfathering Unpurchased Card Stock 205.20(e)(1):

The effective date for compliance should be extended for all cards existing in the marketplace.

The Credit CARD Act requires final rules to be adopted by the Board that become effective no later than August 22, 2010. The Board has requested comments on the potential costs to issuers and other program participants to remove and replace existing card stock in store inventory to ensure that all cards sold after the effective date are in full compliance with the Rules. In addition, the Board has requested comments as to whether it should grandfather cards that are in the marketplace as of the effective date from some or all of the requirements set forth in the Proposed Rules. The Board has noted that it intends to limit such relief to only cards that are sold in physical retail channels, and not to provide relief for cards that are purchased online or by phone. Finally, the Board has requested comment as to how issuers or vendors should alert consumers to the revised terms regarding fees and expiration dates.

Costs.

If the rules as proposed become final on February 22, 2010, the industry will have 6 months to produce and merchandise new stock, as well as remove old stock, and possibly manufacture and install new displays and signage. As issuers of gift and reloadable cards rely on a limited number of third party vendors for services such as card production and merchandising, these vendor resources will be hard pressed to meet the needs of the affected members of the prepaid industry by the compliance deadline. Assuming that it is possible to accomplish this in 6 months, our information indicates that to replace all card stock in inventory at retail by August 22, 2010 would be significant.

Online Sales.

We question the reasoning behind the suggestion that no older inventory should be distributed for online sales. Because issuers control the disclosures on their websites, and the packaging of cards sold directly from their own inventory, if online sales of older inventory were permitted, it could allow issuers to package older inventory with very clear and conspicuous meaningful disclosures, and allow such issuers to replace the inventory at the retail point-of-sale more quickly.

Recommendation: We encourage the Board to grandfather all cards already in the marketplace, including cards that are sold online or via telephone, as of the effective date of August 22, 2010 for an additional period of two years, until August 22, 2012.

bringing money to LIFE



Remaining Gift Inventory after August 22, 2010

MetaBank recommends that the rules allow the sale of remaining gift card inventory to consumers until at least January 31st 2011. Although such cards would have an expiration date of less than 5 years, and notice of fees, after August 22, 2010, MetaBank proposes that the regulations should allow issuers to continue to sell existing inventory, so long as included with the sale of such card is a clear and conspicuous message on the customer receipt or other disclosure method that would explain the card will be treated in accordance with the new rules, including expiration date restrictions, and fee restrictions. The back of MetaBank's existing card inventory includes notice to the cardholder of a telephone number or website that the cardholder may contact for card replacement at expiration. We believe that the proposed rules should clarify that such practices are compliant with the Proposed Rules.

Already sold cards – Replacement Cards Upon Plastic Expiration

The Board has requested comments regarding a proposed requirement that issuers of reloadable cards must automatically issue replacement cards to consumers prior to the plastic expiration date if the funds expiration date is later. (74 *Fed. Reg.* 60999.) As the Board has noted, not all issuers of such cards have systems in place to collect consumers' personal information, at the point-of-sale or otherwise, and creating such systems could be prohibitively expensive. As such, issuers will not have reliable addresses to send replacement cards if consumers do not notify them of changes in address (which is not unlikely in a five year period).

We strongly urge against a requirement for automatic replacement of expired reloadable cards. It is not usual or necessary for gift card products, and would increase the risk of fraud for those cards. To ensure compliance, either sellers of gift card products would be required to collect personal information from purchasers at the point of sale, or issuers would be forced to use temporary cards and require recipients to provide personal information before receiving a permanent, reloadable card, in order to ensure that information is collected from all cardholders. As the Credit CARD Act's focus is on *gift* cards, it is quite possible that the card purchaser may not have relevant recipient information available at the time of purchase. Requiring the use of temporary cards would significantly increase costs and infuse a layer of complexity into a product that consumers choose as a gifting option largely due to their convenience. Requiring the automatic issuance of replacement cards may also be viewed by consumers as interfering with their privacy, and is wasteful of both paper and plastic resources. Consumers are able to request a replacement card free of charge, and many may need to provide an updated mailing address from the one given at or around the of card purchase. MetaBank does not require the financial institutions that offer our turn key solution and sell gift cards to collect name and address information, and often the card purchaser and the gift card recipient are not the same person.

bringing money to LIFE



Issuing replacement cards prior to the expiration date would not be possible in most cases due to the lack of personal information that is not available.

Recommendation: The Board should not require issuers of reloadable cards covered by the Credit CARD Act to automatically issue replacement cards prior to the plastic expiration date.

2. Expirations: Funds Expiration vs. Plastics Expiration

MetaBank appreciates the Board's acknowledgement that there are often two "expirations" involved in a single gift card: (i) the expiration date of the plastic card or certificate itself (the "plastic" expiration), and (ii) the expiration date of the underlying funds (the "funds" expiration). Many cards have plastic expiration dates as indicated by the "valid thru" date printed on the front of the card. But passage of such a date does not always mean that a cardholder has lost his or her funds. In fact, most funds on MetaBank issued cards do not expire.

The Board has suggested two alternatives for addressing gift card expiration date issues. The first, Alternative A, requires that all plastic expiration dates be at least 5 years after the date the card is sold or issued. (§ 205.20(e)-Alternative A, 74 *Fed. Reg.* 61006-07.) Alternative A would likely pose technological challenges to sellers of gift cards, as they would need to determine at the point of sale and prior to purchase if enough time remains before the plastic expiration date. In addition, it may also inconvenience consumers (those purchasing gift cards or merely in line behind such persons) if sellers need to manually review cards' expiration dates before the purchase transaction is completed.

The second, Alternative B, appears to allow cards with plastic expiration dates of less than 5 years to be offered for sale, provided that the issuer/seller has policies and procedures in place that will ensure consumers have a reasonable opportunity to purchase gift cards with at least 5 years remaining before the plastic expiration date. (§ 205.20(e)-Alternative B, 74 *Fed. Reg.* 61007.) Based on the proposed interpretations, Alternative B appears to be more flexible in accommodating inventory that may have aged to be offered for sale (that is, cards that have less than 5 years remaining before the plastic expiration date, at the time the card is sold or issued), so long as the cards were originally placed on display for sale at retail with at least 5 and ½ years remaining before the plastic expiration date. (Official Staff Interpretation on Paragraph 20(e)-Alternative B, 74 *Fed. Reg.* 61012.) Significantly, both of these alternatives require the issuer to ensure that the underlying funds expiration does not occur until a full 5 years from the date of purchase, and to provide, upon request, replacement gift cards free of charge.

Recommendation: As between Alternatives A and B, MetaBank urges the Board to adopt the Alternative B language on expiration dates as a permanent, not just temporary, solution. This

bringing money to LIFE



alternative provides issuers and sellers of gift cards with greater flexibility to deal with aged inventory, while still generally offering cards for sale to consumers with plastic expiration dates that meet requirements set by the Board.

A separate activation date should not impact the start of the 5-year expiration period.

The Board proposes that a certificate or card not be considered to be issued or loaded with funds until such card has been activated, the activation date being the start of the five year expiration period. (74 Fed. Reg. 61001.) A troubling issue arises when gift cards have an “activation date” which is different from the “sale date.” Most of MetaBank’s gift cards are mailed or delivered without being activated, and the recipient is instructed to activate the card upon receipt. Even if a card is sold to a consumer with more than the minimum 5 years until expiration of both the plastic and the funds, it is possible that the recipient won’t activate the card until after a delay of many months. Issuers would be required to track activation dates separately from sale dates, which could pose technological difficulties. Moreover, issuers would simply be unable to ensure that plastic expiration dates are greater than 5 years from the time of card activation if a cardholder has waited several years between receipt and card activation.

Recommendation: We request clarification from the Board that, when a gift card has a different sale and activation date, the timing for expiration date purposes (for both the plastic and the underlying funds) begins when the card is sold, to make clear that subsequent activation does not re-start the clock or create a new expiration date.

3. Exemption issues 205.20(b)(5):

The Paper Exemption.

The Proposed Rules include an exemption for cards, codes, or other devices where the sole means of issuing the card, code, or device is by paper. (74 Fed. Reg. 60995.) The end result of this exemption is that businesses that have been using gift cards will now, to avoid compliance with the Credit CARD Act, simply revert back to using paper gift certificates. Such circumvention of the act is inconsistent with the purpose of the Proposed Rules. Such reversion back to paper gift certificates is anti-competitive since it is likely to result in devastating effects to the gift card industry, reducing gift card orders, gift card use, as paper-only gift certificate programs replace gift cards to avoid Credit CARD Act compliance.

Recommendation: We request the paper exemption be excluded from the final rules.

bringing money to LIFE



General Purpose Reloadable Card Exclusions:

Proposed § 205.20(b)(2) implements the exclusion for cards, codes, or other devices that are reloadable and not marketed or labeled as a gift cards or gift certificates. *See* EFTA Section 915(a)(2)(D)(ii). Consistent with the statute, the card, code, or other device must be both reloadable *and* not marketed or labeled as a gift card or gift certificate to qualify for the exclusion. Thus, a nonreloadable card is not excluded, even if it is not marketed or labeled as a gift card or gift certificate, unless a different exclusion applies. (74 *Fed. Reg.* 60992.) MetaBank has several recommendations, as follows.

Reloadable Card Marketed or Labeled as a Gift Card Issue 205.20(b)(2)-3:

Proposed comment 20(b)(2)-2 clarifies the meaning of the term “marketed or labeled as a gift card or gift certificate.” Under the proposed comment, the term means directly or indirectly offering, advertising, or otherwise suggesting the potential use of a card, code, or other device as a gift for another person. Moreover, whether the exclusion applies does not depend on the type of entity that is making the promotional message. For example, a card may be marketed or labeled as a gift card or gift certificate if anyone (including the issuer, the retailer, the program manager that may distribute the card, or the payment network on which a card is used), other than the purchaser of the card, promotes the use of the card as a gift card or gift certificate. (74 *Fed. Reg.* 60992.)

This is not a realistic assessment of what could possibly be considered as “marketed or labeled as a gift card or gift certificate.” Retailers (such as grocery stores or drug stores) feature display racks that make gift cards available along side of other types of prepaid cards, including general purpose reloadable and telephone cards. Floor and rack space is scarce in grocery, drug store and bank retail environments. Resulting space limitations will require gift and other prepaid cards to be located in close proximity to each other. Consumers understand that they typically can find reloadable and telephone cards in close proximity to gift cards. Retailers generally market and emphasize gift cards so that consumers can easily identify and locate the gift card display.

Recommendations: We recommend that card packaging be used to define the separation between gift and other non-gift cards. Reloadable and telephone cards should be packaged with clear identification regarding the intended use of the card and follow the Proposed Rules regarding the exclusion of any “gift” language on the packaging.

bringing money to LIFE



The exclusion for “reloadable” cards is overly narrow.

The Proposed Rules exclude from the definitions of the terms gift certificate, store gift card and general use prepaid card cards that are “[r]eloadable and not marketed or labeled as a gift card or gift certificate.” (§ 205.20(b)(2), 74 *Fed. Reg.* 61006.) MetaBank is concerned about a limitation on the term “reloadable” that was not anticipated. The definition of “reloadable” in the proposed interpretations is limited to those cards with the “capability of having more funds added *by a cardholder* after initial purchase or issuance.” (Official Staff Interpretation on Paragraph 20(b)(2), 74 *Fed. Reg.* 61008 (*emphasis added*).) There are many non-gift prepaid cards in popular use that are reloadable, but not by the cardholder. For example, many payroll cards are reloadable solely by the employer; health savings account cards and flexible spending account cards are reloadable, also by the employer; university cards, insurance cards, disaster relief cards and corporate expense cards may all reloadable as well, but not by the cardholder. Such cards should not be included within the definition of “general use prepaid cards” and should not be subject to restrictions designed solely for gift card products. In addition, possible result of this language may be to make more cards (which do not currently have that function) reloadable by the cardholder.

Recommendation: We urge the removal of the condition “by a cardholder” in the limitation on the definition of “reloadable” as it makes the exclusion overly narrow and leads to the unintended consequence of subjecting many useful non-gift prepaid products to these Rules which are intended only to cover gift cards.

Temporary, non-reloadable cards that provide access to general purpose reloadable cards should be excluded.

The Board requested comments on the appropriate treatment of non-gift general-purpose reloadable cards that are initially sold as a non-reloadable card. (Preamble, 74 *Fed. Reg.* 60993.) The Board expressed concern that if such products were excluded, the consumers that elect not to register the card (and thus do not receive a reloadable card) are left without the statutory protections provided by the Credit CARD Act. Alternatively, the Board observed that if such products are not excluded, then the exclusion in the Proposed Rule for reloadable cards not marketed as gifts (§ 205.20(b)(2)) would be essentially be eliminated for many general-purpose reloadable cards.

A third approach the Board considered was applying the restrictions in the Rules on fees and expiration dates to only the initial, non-reloadable card, and not to the reloadable replacement card. However, the Board expressed concern that this approach may confuse or surprise

bringing money to LIFE



consumers when they receive new terms regarding fees and expiration dates for the reloadable card that are different from those initially disclosed for the non-reloadable card.

We believe there is a fourth option: using its “Additional Rulemaking” authority granted by Congress, the Board should issue a new Rule regarding such temporary cards (which were not contemplated or addressed in the original legislation). These temporary cards are necessary and integral to most general purpose reloadable card programs that serve the unbanked and underserved populations. They are not gift cards and were never intended to be included in this gift card legislation. These temporary card products are not marketed or sold as anything *other than* general-use, non-gift reloadable prepaid cards. The card packaging clearly indicates that the consumer is purchasing a reloadable non-gift card and includes all disclosures applicable to a reloadable non-gift card. As a convenience to the customer, a temporary card is provided at the point-of-sale in order to allow the consumer immediate access to their funds while their personalized card is being printed and mailed. Such non-reloadable temporary cards are not only a convenience to the consumer, but they also reduce the risks of money laundering, by strictly limiting the amount of funds to be loaded on the anonymous temporary card. If the consumer does not pass the issuer’s customer due diligence review, a personalized card is not issued and, in lieu of a refund check, the consumer has the option to spend the remaining funds loaded onto the card. Fees are generally not assessed in those circumstances.

In considering this issue, it is important to understand that general purpose reloadable prepaid card providers do not want their cards to be purchased or used as a gift card. They are in the business of establishing long-term relationships with their cardholders and the typical short-term gift card usage actually creates a loss for them. They have no incentive whatsoever to induce a consumer who is seeking a gift card to purchase a general purpose reloadable card.

Provided that the temporary cards are clearly designated as temporary cards, and are issued solely in connection with a long term, reloadable, general purpose prepaid card program, such cards should *not* be subject to the Credit CARD Act restrictions. Certainly disclosures should be made ON the card and on the packaging at the time the temporary card is sold to consumers, and once again when the temporary card is “registered” and/or at the time the personalized, reloadable card is sent to the cardholder.

Recommendation: We urge the Board to explicitly exclude any temporary non-reloadable card offered at retail solely in conjunction with a non-gift, general purpose, reloadable card product, which provides access to the ultimate personalized, reloadable card, from the coverage of the Proposed Rules. This will allow one set of terms regarding fees and expiration dates that are consistent for the temporary card and the personalized reloadable replacement card. Consistency

bringing money to LIFE



of terms will eliminate surprise and confusion and will allow the general purpose reloadable card to be issued and used as intended.

4. Abandoned property escheatment issues – State preemption:

Preemption of state laws with respect to escheat provisions should be clarified.

The Board’s discussion of the Proposed Rules notes that the EFTA, as amended by the Credit CARD Act, does not preempt that any state laws that address fees or expiration dates for gift cards unless those state laws are inconsistent with the ETFA. State laws are not deemed to be inconsistent if they provide greater consumer protections than the gift card provisions in the Credit CARD Act. (74 *Fed. Reg.* 60988.)

We believe this section was inserted with state consumer protection laws in mind. However, there are another set of state laws that impact gift cards: state abandoned property laws. There is a public misconception that gift card issuers simply keep unused gift card funds. In fact, many state laws require issuers of unused gift cards to send the unused/abandoned funds to the state where the cardholder resides or where the issuer is incorporated - usually either 3 or 5 years after the card is sold or last used. It appears the result of the interplay of these abandoned property laws combined with the Proposed Rules will be that many issuers will be required to remit (or “escheat”) funds to the state while still remaining obligated to keep the cards open and provide free replacement cards for several more years.

Recommendation: We request that the Board clarify that state escheat restrictions requiring escheat of funds from gift cards or gift certificates be superseded so that card issuers are not required to escheat funds to the state until after both the plastic and funds expiration dates have passed and until the issuer is no longer required to offer free replacement cards.

5. Fees issues 205.20 (a)(6):

We believe the Board has generally set forth fair and reasonable rules regulating fees on gift cards, which benefit consumers while still ensuring that gift cards, a very popular and useful product, are available to the public. In particular, we support the Board’s decision not to impose any dollar caps on fees, nor to set a maximum balance over which fees may not be debited, provided of course that there are clear and prominent disclosures on the terms of such fees. (§ 205.20(d), 74 *Fed. Reg.* 61006.)

We also appreciate that the Board has clarified that the “one fee per month” rule applies solely to dormancy, inactivity or service fees. (§ 205.20(d)(3), 74 *Fed. Reg.* 61006.) The term “service

bringing money to LIFE



fee” is defined as “a periodic fee for holding or use of a gift certificate, store gift card, or general use prepaid card.” (§ 205.20(a)(6), 74 *Fed. Reg.* 61006)

However, a “periodic fee” is explained in the Proposed Rules as including any fee that may be imposed on a gift certificate, store gift card, or general-use prepaid card from time to time for holding or using the certificate or card, such as a monthly maintenance fee, a transaction fee, a reload fee, or a balance inquiry fee, whether or not the fee is waived for a certain period of time or is only imposed after a certain period of time. A service fee does not include a onetime fee, such as an initial issuance fee or a cash-out fee. (74 *Fed. Reg.* 61008.) The Board notes that such “periodic fees” include “a transaction fee, a reload fee, or a balance inquiry fee.” This is at odds with the clarification that a “service fee” is a periodic fee for holding the card since transaction, reload, and balance inquiry fees are based upon the consumers use. This would mean that a balance inquiry or reload fee could not be charged in the same month as a maintenance or dormancy fee. This is a concern because issuers typically incur separate charges from their networks, processors and/or service providers for such “optional,” non-automatic, uses by cardholders.

Periodic fees should be distinguished from service fees, thus allowing for the charging of a service fee in the same month as a dormancy/inactivity fee. One periodic, dormancy/inactivity fee per month is appropriate and acceptable. However, service fees are distinguishable from periodic/dormancy/inactivity fees in that service fees are charged for a specific service versus dormancy/inactivity fees being charged for non-use of the card. The debiting of service or use fees should be considered separately. Generally, there are costs per “activity, or service” associated with gift card services, i.e., balance inquiry fees, or international exchange fees for use of the gift card outside of the United States, that aren’t necessarily a periodic, repeated fee. International transaction costs are higher than domestic transaction costs. Allowing for the assessment of an international “per-transaction” fee is appropriate to the use of the gift card provided all fees are disclosed clearly and conspicuously. Additionally, added functionality such as “balance alerts via text messaging” should be considered. There are costs associated with providing services like this and other functionality enhancements not yet contemplated. The rules around fees should contemplate the associated costs allowing for innovation that will provide the consumer with value and a better product experience.

Recommendation: We believe that Congress’ intent in limiting “periodic” service fees to once per month would exclude occasional, and non-periodic fees generated by consumers’ actions – other than actual “use” of the cards – such as balance inquiry fees, reload fees, or other fees that are not automatically charged either on a periodic basis or when a card is used to make a purchase. We request that the Board clarify that fees such as balance inquiry fees and reload fees, which are consumer initiated (that is, due to an action or request by the consumer) but are not

bringing money to LIFE



periodic nor the result of holding the card, and which are clearly disclosed, are *not* “service fees” and are permitted to be charged in the same month as a periodic service fee, if applicable. This critical issue regarding the definition of “service fees” also has significant repercussions with respect to card disclosure requirements.

6. **Disclosures:**

Font Size

New EFTA Sections 915(b)(3)(A) and (c)(2)(B) (15 U.S.C. 1693m(b)(3)(A) and (c)(2)(B)), as added by Section 401 of the Credit CARD Act, require that the disclosures made pursuant to those paragraphs be clear and conspicuous. Though the proposal requires that the prescribed disclosures be clear and conspicuous, it does not include a specific type size or prominence requirement, except where otherwise noted. The Board expressed belief that requiring *every* disclosure on a certificate or card to have an equal prominence or a minimum type size standard is impractical, because the size of certificates or cards will vary. Therefore, a general type size that is appropriate for one card may not fit on a smaller card, due to the limited amount of space. Moreover, such standards would present issues for disclosures even on standard-sized cards, because the amount of space on such cards is limited. The Board requests comment on whether description of the clear and conspicuous standard in the final rule should include a type size or prominence requirement for all disclosures and, if so, what standard is appropriate. The Board also requests comment on whether there are alternatives to a type size or prominence requirement that could ensure that disclosures on a card are clear and conspicuous to a consumer. (74 Fed. Reg. 60996.) MetaBank agrees with the Board’s assessment that equal prominence or a minimum type size standard is impractical, and that such standards would present issues for disclosures even on standard-sized cards, because the amount of space on such cards is limited.

Disclosures on the Face and Back of the Card

The above paragraph describes that space is limited on gift cards. The Board recommends dormancy, inactivity, or services fees and the conditions under which they can be imposed are required to be disclosed on the gift certificate, store gift card or general-use prepaid card. Disclosure on the card may be difficult due to space limitations. Furthermore, due to the size of the card and network restrictions on the area available to print additional information, it would be impossible to print such information on the card using the clear and conspicuous standard. MetaBank has attached such network descriptions as Exhibit A to this letter. The Exhibit shows how the networks have specified placements and locations for the requirements that must appear on a network branded card, causing space limitations for disclosures.

Recommendations: The expiration date and the periodic fee should be disclosed on the card. Any other fees should be included in terms and conditions presented at time of purchase and

bringing money to LIFE



should be available via the telephone number and web site that is disclosed on the back of the card.

Conclusion

MetaBank supports the goals of the Board's Proposed Rules and we respectfully urge the Board to consider all of the comments and suggestions set forth herein. MetaBank appreciates your consideration of these views. If any other information would be useful regarding these matters, please contact Jessica Zitterkopf at 605-782-1821 for any further clarification.

Sincerely,

Jessica Zitterkopf, Esq
Senior Legal Counsel
MetaBank dba
Meta Payment Systems

Ellen Smith, Esq
Associate Counsel
MetaBank dba
Meta Payment Systems

Benjamin Arnold
Director, Product Management,
Agent Products
MetaBank dba
Meta Payment Systems

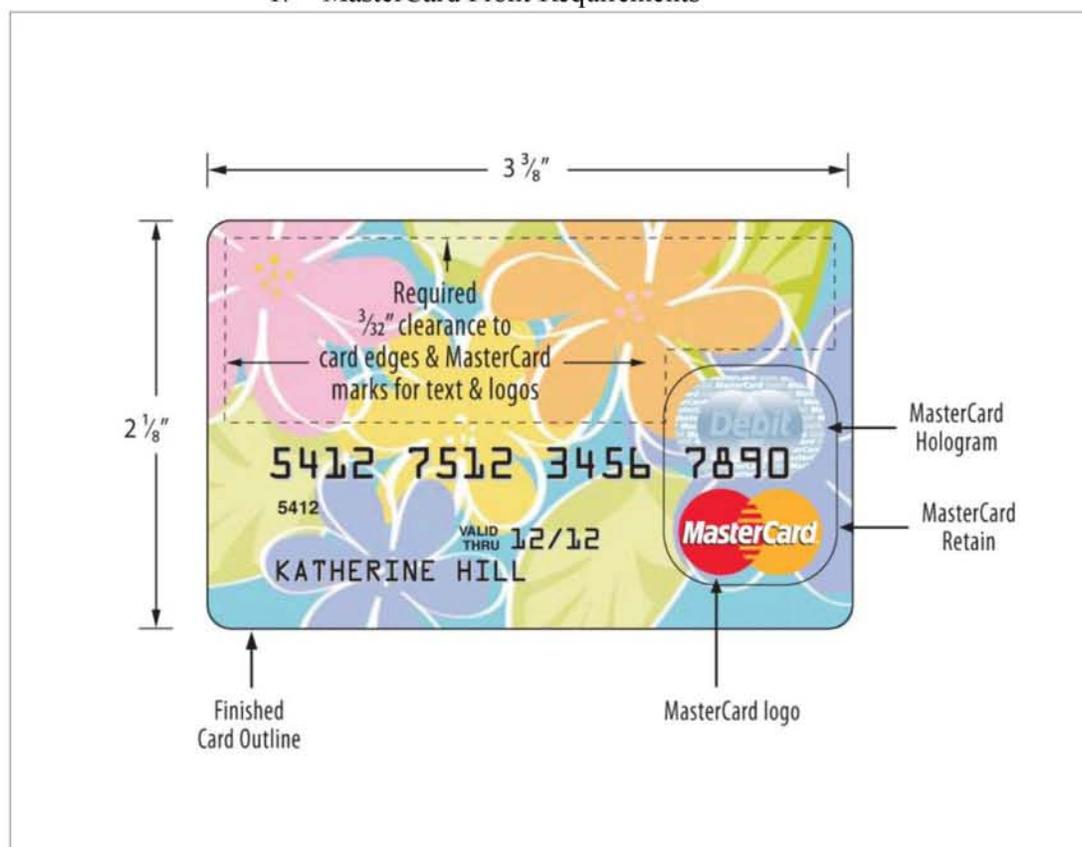
bringing money to LIFE



Exhibit A

Network Restrictions – Page 1 of 3

1. MasterCard Front Requirements



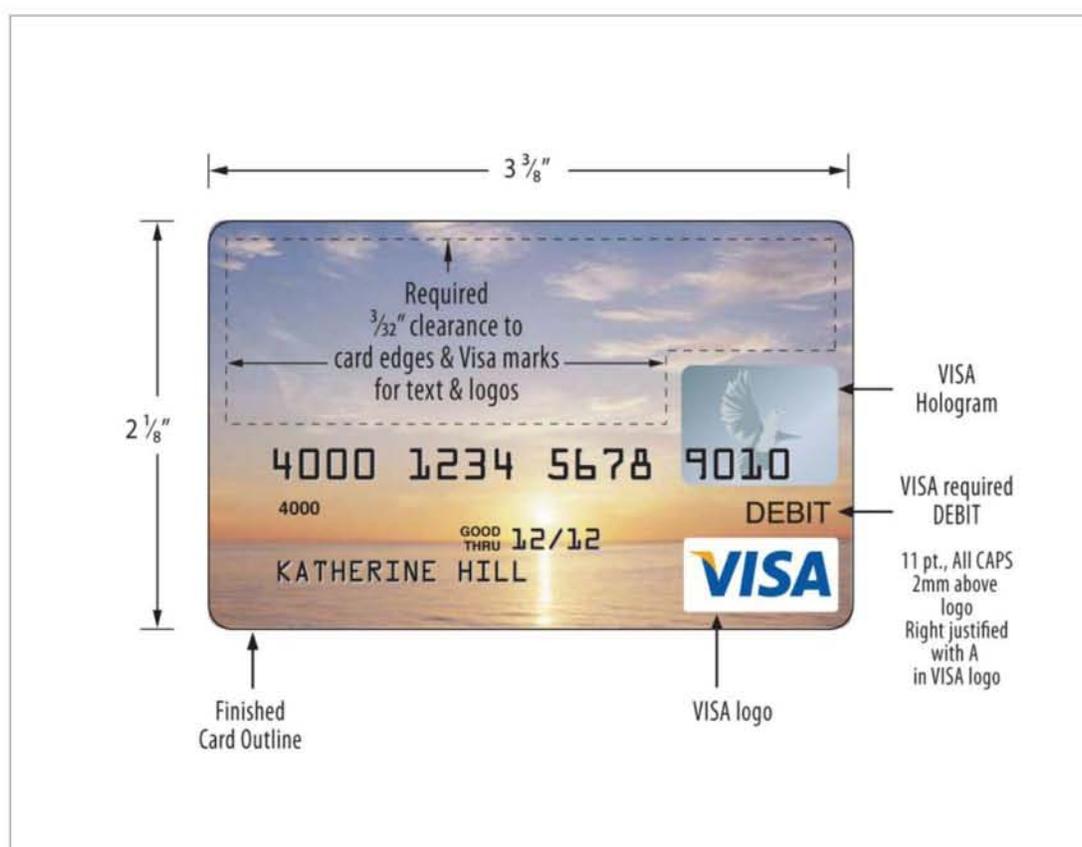
bringing money to LIFE



Exhibit A

Network Restrictions – Page 2 of 3

2. Visa Front Requirements



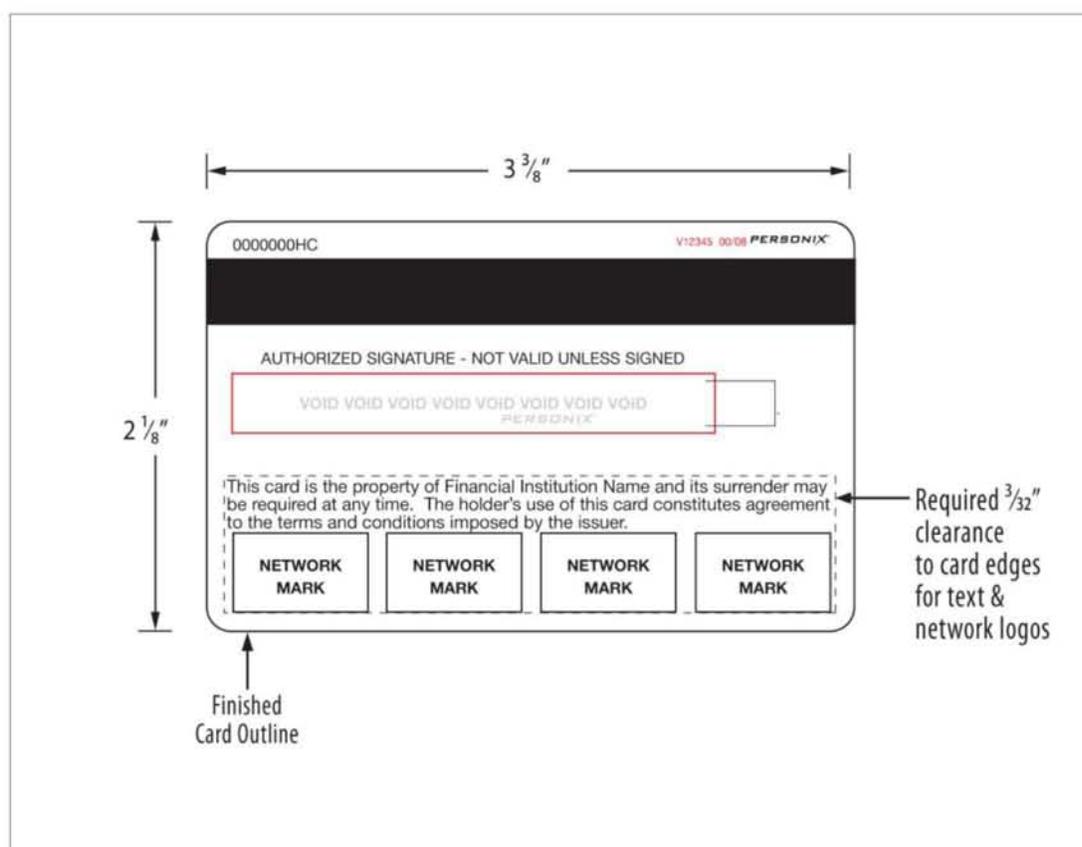
bringing money to LIFE



Exhibit A

Network Restrictions – Page 3 of 3

3. Requirements for the Back of the Card



bringing money to LIFE