



11350 Random Hills Rd., Ste. 800
Fairfax, VA 22030

Ph: (703) 934-6052
Fax: (703) 934-6058
www.efta.org

April 4, 2011

Chairman Ben S. Bernanke
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Dear Chairman Bernanke:

On behalf of the members of the Electronic Funds Transfer Association (EFTA), I am writing in response to your recent announcement that the Fed is unable to make the April 21st deadline to issue final rules implementing restrictions on debit card fees and network routing restrictions (Durbin Amendment). From a policy perspective, EFTA's membership has different opinions on the merits of the Durbin Amendment and it is not our intent to reargue the policy implications here. At issue is the EFTA's strong belief that **the changes necessitated by the Durbin Amendment cannot be implemented without clear and concise rules/standards from the Federal Reserve. Nor do we believe those changes can be implemented by Dodd-Frank's implementation date (July 21st) without prudent end to end testing and validation to ensure the integrity of the payments system.**

EFTA is the nation's leading non-profit, inter-industry trade Association dedicated to the advancement of electronic payment systems and commerce. EFTA was formed and helped in drafting the Electronic Funds Transfer Act in 1975 with which we share the same acronym. The Association's nearly 300 members represent a broad spectrum of perspectives to accurately and effectively analyze payments issues like this. Members include the nation's leading financial institutions, electronic payments networks, card companies, ATM networks, owners, and processors, hardware and software manufacturers, and technology providers.

EFTA appreciates the Federal Reserve's difficult task in crafting a final rule while accounting for more than 11,000 comment letters. We understand the challenge in addressing the complex operational issues involved in implementing the Durbin Amendment. However, the scope of this effort will result in a material change to a global payments infrastructure impacting hundreds of millions of consumers, millions of merchants, 15,000 financial institutions in the United States, and hundreds of processors. The industry needs at minimum 90 and more likely 180 days from the publication of final rules in order to make and test the changes necessitated by those rules. Such a delay will help ensure that Durbin implementation gets done properly.

Thank you, in advance, for your time and consideration to this important matter.

Sincerely,

A handwritten signature in cursive script that reads "James A. Hanisch".

James A. Hanisch
Chairman

A handwritten signature in cursive script that reads "Kurt Helwig".

Kurt Helwig
President & CEO



Board of Directors

Lynne Barr
Partner
Goodwin, Procter, LLP

James L. Brown

Daniel Cage
President
Linq3 Technologies

Robert Craig
EVP & GM
Online Resources Corporation

Frank D'Angelo
EVP, Payment Solutions
FIS

JB Donaldson
Director, EPC Business Development
ACS State & Local Solutions

Tony Emrick
Senior Vice President
FTPS, LLC

Trevor Fall
EVP, North American Sales
Phoenix Managed Networks, LLC

Paul Finch
President & CEO
Early Warning Services, LLC

Kevin Gregoire
President
Fiserv EFT

James Hanisch
SVP, Corporate Development
CO-OP Financial Services

Keith Harrison
SVP, Product & Alliances
Q2ebanking (Q2 Software, Inc.)
a CBG Holdings, Inc. Company

Alex Hart
Chief Executive Officer
Tier Technologies

Sandra Hartfield
Sandra Hartfield Enterprises

Kurt Helwig
President & CEO
Electronic Funds Transfer Association

Joe Hurley
VP, Network Strategic Development
Discover Financial Services

Wayne Malone
Head of Deposits & Retail Payments,
Citi – International Retail Banking

Patricia O'Donnell
Executive Director
JPMorgan

Christopher Penny
SVP, Corporate Development
Transaction Network Services, Inc.

Patricia Preston
Group Head
MasterCard Worldwide

Ben Psillas
President
Allpoint Network

Joe Samuel
SVP, Global Public Affairs
First Data Corporation

Hamed Shahbazi
Chairman & CEO
TIO Networks Corporation

Steve Taylor
EVP Operations & CFO
PreCash, Inc.

Ronald Wieselberg
VP, Business Development
SafetyPay

EFTA Officers

Jim Hanisch, Chairman
Wayne Malone, Vice-Chairman
Sandra Hartfield, Treasurer
Lynne Barr, Secretary
Kurt Helwig, President & CEO

Council Chairs

Dennis Ambach, *Chairman, Legislative & Regulatory Council*

Charlie Kroll, *Chairman, eFinancial Enablers Council*
CEO
Andera, Inc.

John Pfeuffer, *Chairman, eGovernment Payments Council*
Director of Business Development, EFS
ACS State & Local Solutions, Inc.

Emeritus Board of Directors

Bob Barone
Tom Bennion
Jack Benton
Steve Cole
Ron Congemi
Ray Crosier
Neil Marcous
Rod Reef