From: Americas Credit Union, Leon G. Wittner

Subject: Reg I I - Debit card Interchange

Comments:

Date: Jan 27, 2011

Proposal: Regulation II - Debit Card Interchange Fees and Routing

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Comments:

Effects of lower interchange fees will result in huge increased profits to merchants and will result in additional fees to account holders (consumers) to off set the loss to our Credit Union. Merchants currently price the products they sell with a markup based on the most expensive fee they will pay. If you pay cash for a product the price will still include the cost to process a credit card, debit card or check processing fee since the merchant does not know who will pay cash. We have 35,000 members and our main goal is to serve the Military at Fort Lewis, WA and without the interchange fee we currently earn we will have to charge a monthly fee or transaction fee for each transaction. We estimate that checking and debit cards will incur a monthly charge of 6 to 7 dollars a Month that will come out of our young soldiers pay when it is deposited. I am a volunteer Board Member of a non-profit Credit Union and we strive to provide service to our members at the least cost. Loss of

interchange fees will only increase the bottom line profits of companies like Wal-Mart and will not create one job for America. I can guarantee you there will be less money in individual's pockets and less traffic through the doors of stores.