

From: Americas Credit Union, William F. Crane
Subject: Reg I I - Debit card Interchange

Comments:

Date: Jan 30, 2011

Proposal: Regulation II - Debit Card Interchange Fees and Routing

Document ID: R-1404

Document Version: 1

Release Date: 12/16/2010

Name: William F Crane

Affiliation: America's Credit Union

Category of Affiliation: Commercial

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

The current proposal does not even cover the cost of network fees. The proposal to decrease fees paid to the financing institution will hurt the consumer. Big box department stores will not decrease prices to the consumer and financing institutions will have to either discontinue the availability of debit cards or implement fees for their use to cover the cost including fraud losses. Do not change the current fees. Thank you.