

From: Panora State Bank, Gladys K. Willey
Subject: Reg I I - Debit card Interchange

Comments:

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Proposal: Regulation II - Debit Card Interchange Fees and Routing

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Comments:

The FRB proposal sets artificially low caps on debit interchange that do not reflect the true costs of running a secure, reliable, and efficient debit network. Under this proposal, consumer costs are likely to increase both at retail checkout and for services such as checking accounts and debit cards. Changes of this magnitude should NOT be imposed without serious debate, analysis, and study.