From: Saginaw County Employees Credit Union, John F. Klass

Subject: Reg I I - Debit card Interchange

Comments:

Date: Feb 03, 2011

Proposal: Regulation II - Debit Card Interchange Fees and Routing

Document ID: R-1404 Document Version: 1 Release Date: 12/16/2010 Name: John F Klass

Affiliation: Saginaw County Employees Credit Union

Category of Affiliation: Commercial

Address: City: State: Country: Zip:

PostalCode:

Comments:

In January of 2011 our small credit union earned \$5559.89 in interchange income on our Debit Card program. Our Debit Card processing cost for the same time period was \$5103.14 (the expense figure doesn't include any employee or facilities cost). Debit Cards at best are already a break even service. If Interchange income is drastically reduced by the proposed amendment, we will be forced to make up our lost income by increasing fees somewhere else. Please do not approve the Durbin Amendment.