

From: WWS ATM Sales and Service, Roger Mogan
Subject: Reg I I - Debit card Interchange

Comments:

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To Whom it may Concern:

WWS is a small independent ATM company, and we are being very adversely impacted by the recent large credit card companies getting banks to issue one network only credit cards. The networks, particularly Master Card, have drastically reduced the interchange we used to earn on ATM transactions, and with their logo being the only one on millions of credit cards, we are suffering severe loss of revenue.

The networks force us to charge the same surcharge to consumers, regardless of what we earn on the transaction, irrespective of which network the card is routed through, and this is going to result in many ATM companies either raising consumer fees on all transactions, or possibly go out of business.

The networks are taking the money they are now charging us for the transactions, and giving it to the issuing banks to sweeten their deal with the banks, in effect giving the money the network took from us to the banks, to issue the one network only card.

The effect of forcing more than one unaffiliated network on each card may allow us to survive, and also keep charges to consumers lower than will otherwise be the case. Also, the network rules we are forced to sign, not allowing us to vary the surcharge fee based on our cost to run the consumers transaction is price fixing at its finest.

We need some reform of the Networks and their anti-competitive actions!

Kindest Regards,

Roger Mogan
WWS ATM Sales and Service