

From: Consumers Credit Union, Sean M Rathjen
Subject: Reg II - Debit card Interchange

Comments:

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Proposal: Regulation II - Debit Card Interchange Fees and Routing
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Comments:

Our credit union offers 4.09% on checking account balances up to \$10,000 but this would not be possible if the interchange revenue is reduced to 12 cents per transaction. The impact would be more than our total net income in 2010 resulting in a reduction in deposit rates, increase in fees or an increase in loan interest rates. We want our Rewards Checking product to remain in place with no fees, high interest and the refunding of all ATM surcharges. This product would be in jeopardy in the event we only receive 12 cents per transaction. Finally, we are trying to increase member growth by having no fees and actively penetrating the "unbanked" market. This strategy would be difficult to pursue in the event our interchange revenue is reduced. I can't emphasize enough that the cost of this change would be absorbed by the consumer. Thank you, Sean M. Rathjen