From: Edward T. Lydick

Subject: Reg I I - Debit card Interchange

Comments:

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Proposal: Regulation II - Debit Card Interchange Fees and Routing Document ID: R-1404 Document Version: 1 Release Date: 12/16/2010 Name: Edward T Lydick Affiliation: Category of Affiliation: Address: City: State: Country: Zip: PostalCode:

Comments:

Instead of capping all POS transactions for banks with assets] \$10 billion, why not begin capping transactions at a level consistent with what a \$10 billion bank would expect to have? For example, the average \$10 billion bank supports 100 million POS transactions per year, so all POS transactions below 100 million are exempt from Durbin. The first POS transaction over 100 million would be subject to POS cap. This would support community banks, and avoid the networks supporting a two-tier system.