

From: Mark E. Novitzki
Subject: Reg I I - Debit card Interchange

Comments:

February 10, 2011

Jennifer J Johnson
Secretary, Board of Governors of the Federal Reserve System
20th St and Constitution Ave, NW
Washington, DC 20551

Dear Jennifer Johnson:

We just spent over two hours in a joint IT and Compliance meeting for our three bank charters. The bulk of the meeting was consumed by: ATM ADA Compliance FACTA Compliance SAFE ACT Compliance and OFAC Politically Exposed Person Compliance. Also discussed was the Durbin Amendment to the Dodd Frank Bill.

The first four topics centered on how much it will COST us to comply with these new regulations.

The ADA Amendment to ATM's could cost Premier Banks \$80,000.00 for our 20 machines or \$4,000.00 per machine.

In 2009 there were over 403,000 ATM's in America. That is only 1 Billion Eight Hundred Thirteen Million dollars to comply.

The costs to comply with Dodd Frank are impossible to measure at this time but we feel the Durbin Amendment alone will cost us several hundred thousand dollars in fee income.

We lost money in 2010!

Where will we make up the difference?

The only banks that can afford to comply are those that Congress bailed out to start with. The rest of us 7,000 or so are expendable.

I just want somebody in DC to publicly declare the obvious, WE DON'T CARE ABOUT SMALL BANKS AND WE WANT 3,000 OR MORE OF THEM TO DISAPPEAR!

There I said it, now I want someone in DC to say it.

If that is what you want then say it!

If that is NOT what you want, you better hurry up and do something about it.

Sincerely,

Mark E. Novitzki