

February 7, 2011

Ms. Louise Roseman
Director
Division of Reserve Bank Operations and Payment Systems
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

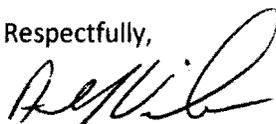
Re: The Impact on Community Banking from the Provisions of Section 1075 of the Dodd-Frank Act related to Debit Card Interchange Fees.

I work at a small Midwest Community Bank. I have concerns related to the Provisions of Section 1075 of the Dodd-Frank Act related to Debit Card Interchange Fees even though the institution where I work is below \$10 billion and would be exempt from the provisions, but as we have seen in the past these provisions have been overturned shortly after passage.

My concerns are:

1. If anyone actually would investigate the actual cost of a Debit Card program they would find out it is not as lucrative as it seems. There are many charge off accounts, countless hours investigating unauthorized charges, the cost of the cards along with the cost to replace them, plus there are so many others cost that are associated with the program that to say that banks are being overcompensated is just ludicrous. It would seem paying \$30,000 for a NEW vehicle is ludicrous until you think about what cost are associated with this price.
2. The reduction of these fees will lead to more consumer fees, fewer product choices and greater consumer confusion regarding card acceptance. There will be NO "Free Checking".
4. Community donations will be reduced significantly if these fees are reduced.
5. If these fees are greatly reduced as what this Act is all about you will see 100's of thousand of banking jobs lost due to banks having to reduce personnel in order to continue to operate profitably. As many businesses operate in the red for several years until good years come around, banks are not afforded that opportunity.
6. These high end retailers that are in support of this Act have seen 10 times over the positive nature of consumers using Debit Cards in their stores with better cash security, time savings at the check-out lines, increased sales, less fees for their own banking, along with less fees for cash deliveries and pick ups. For them to have wanted us to promote the use of these cards in the past, and then bite the hand that enabled them to increase their net income is really unjustified.

Respectfully,



Alan Vickers
Community President
First Community National Bank, Sullivan, MO