

From: Bangor Federal Credit Union, Stephen Clark
Subject: Reg II - Debit card Interchange

Comments:

February 18, 2011

Federal Reserve Board
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

Dear Federal Reserve Board:

I am sending this letter on behalf of the leaders and members of Bangor Federal Credit Union with the purpose of expressing our concerns with the Federal Reserve Board's proposed regulation that would regulate debit card interchange fees.

Quite simply, debit cards are an important tool for consumers of all means. Consumers use debit cards daily to perform financial transactions throughout the world virtually free. The creation of a policy that will systematically reduce or nearly eliminate revenue that is used to support this payment system will mean that consumers ultimately will have to pay for the system through the creation of additional fees.

Splitting the revenue reduction based on the size of the financial institution will undoubtedly lead to unintended consequences as well. The least of which will be the creation of a tiered system that will be a regulatory issue.

Ultimately, consumers are going to bear the costs that financial institutions will incur as the result of this proposed regulation. It is not a policy that is going to improve the financial position of consumers.

Sincerely,

Stephen Clark