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Subject: Reg II - Debit card Interchange

Comments:

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Proposal: Regulation II - Debit Card Interchange Fees and Routing

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Address:

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Zip:

PostalCode:

Comments:

In response to the Interchange rules implementation issues, America's Credit Union would be willing to participate in the rediscovery of the transactional costs of a debit transaction. We are an institution with less than 10 Billion in assets and could provide the insight of costs relative to smaller financial institutions. As previously presented the current proposed cost structure would in fact reduce our net earnings up to 41 basis points. The impact will severely impact our ability to compete and or make available services to the underserved or low income markets and restrict our low cost offers to the middle markets. Bottom line we would have to replace the lost revenue by charging our consumers more for their services whereby further eroding available spending in our economy. Just fight for what is right and prevent this from occurring and let the free markets determine where pricing should be. Ken Leonard ACU/CEO