



P.O. Box 1480 • Lone Star, Texas 75668

February 22, 2011

Lone Star
(903) 656-2576

Daingerfield
(903) 645-2206

Jefferson
(903) 665-8998

Mt. Pleasant
(903) 577-3500

www.TheNetCU.com

Board of Governors of the Federal Reserve System,
20th Street and Constitution Avenue, NW.,
Washington, DC 20551
Via Email: regs.comments@federalreserve.gov

RE: Docket No. R--1404 and RIN No. 7100 AD63

Dear Chairman Bernanke:

I am writing to request that the Fed postpone implementation in any version of the proposed changes to Regulation E that would affect interchange and routing of debit card transactions. The debit card system is an extremely complicated and intricate system, and more time is needed to really research the affects of the proposed changes to consumers.

As a 17 year financial industry employee, I can remember a time before debit cards. However, a large majority of credit union members and bank customers rely on debit card transactions because of their safety and convenience.

The proposed fee structure developed for large issuers is far too low and excludes a number of reasonable costs including fraud prevention and data security costs. And while an exemption for credit unions under \$10 billion is proposed, with the complexity of the electronic payment system, this exemption is basically ineffective and unenforceable.

To continue to offer debit cards should these proposals pass, many smaller institutions will have to find additional sources of income or discontinue this service to their members. As a credit union employee, I want to reassure my member owners that I can offer as many and varied services as any large financial institution. I believe that this preserves a freedom of choice that many Americans see as a backbone of our country.

Sincerely,
Elise Webb-Moore

cc: TCUL Advocacy