

From: Kathy
Subject: Reg I I - Debit card Interchange

Comments:

Date: Jan 04, 2011

Proposal: Regulation II - Debit Card Interchange Fees and Routing
Document ID: R-1404
Document Version: 1
Release Date: 12/16/2010
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Comments:

I have worked in the Credit/Debit card industry for over 25 years. I feel the "proposed" changes could negatively impact consumers and potentially cause many Issuers to review their financials as to whether or not it is feasible to stay in the business if it passes. The only reason more consumers are not outraged is because they do not understand that down the line it will affect them. One thing that absolutely needs to be taken into consideration is the Issuers fraud losses. The Issuers continue to sustain Fraud losses due to data breaches where consumers information is not being protected. Why is this not being addressed as a top priority? This is why fraud definitely should be part of the calculation because we depend on the merchants to follow all of the security practices put into place to protect us all from losses and breaches. Interchange income is the only that helps to offset the losses we incur from these breaches. Identity theft needs to be taken more seriously because it effects us all. Another issue that needs to be addresses is merchants sell gift cards. Fraudsters purchase hundreds of dollars in gift cards and resell on the black market. Why can they not pass a regulation that makes it mandatory for the consumer to enter their PIN# in those transactions for another level protection? Why? Because merchants and card associations still make money whether the sale is legitimate or fraud. The issuer is the one stuck holding the bag. Thank you for your time. Respectfully, Kathy