

From: Zach Eychaner
Subject: Reg II - Debit card Interchange

Comments:

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Proposal: Regulation II - Debit Card Interchange Fees and Routing
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Name: Zach Eychaner
Affiliation:
Category of Affiliation:
Address:
City:
State:
Country:
Zip:
PostalCode:

Comments:

This regulation creates a large concern for me in regards to the way that we will be able to offer our products and services to the members of our credit union. ELGA Credit Union is an institution in Genesee County, MI. We have many members who utilize our free checking accounts. We are able to offer accounts that can be used by our membership with no monthly processing fees and without check writing fees or other associated monthly fees due in large part to the ability to offset costs of these accounts with interchange income. The transition of this income from our credit union to merchants will seriously cripple our ability to continue offering competitive products that keep the market fair. There are no guarantees that in making this change, merchants will use this added revenue to do anything besides line their stakeholders pockets. There is a guarantee that in making this change, credit unions and other financial institutions as a whole will have to drastically change how we do business and the members and customers that utilize credit unions and banks will be the ones forced to shoulder the loss of revenue. This is merely a shift of expense from one side to the other that at best will be a wash to consumers, and an additional slap to an industry that, as a credit union, we have experienced too many of already. Please do not allow this regulation to go into effect and be aware of the consequences involved in doing so.