

From: First Central Bank McCook, Donald Moore  
Subject: Reg II - Debit card Interchange

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Comments:

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Proposal: Regulation II - Debit Card Interchange Fees and Routing

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Comments:

Dear Sir or madam: In my opinion the proposal to limit/cap interchange fees will have a negative impact on the industry and consumers. The proposal will impact revenues--needed to absorb risk/losses; bank valuations; and can weaken bank earnings and therefore capital strength. Recent regulatory changes have also lessened consumers options and limited credit and now will limit consumers debit card usage and bank's willingness to issue the cards. This maybe directed at larger banks but an impact will also noticed at smaller banks.