

From: ELGA Credit Union, Rebecca Walker
Subject: Reg II - Debit card Interchange

Comments:

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Proposal: Regulation II - Debit Card Interchange Fees and Routing
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Comments:

I am writing in regards to the proposed changes to the Debit Card Interchange Fees and Routing. I believe that the proposed changes would negatively affect not only our credit union but our members as well. These changes would cause a detrimental loss in interchange income for the credit union. Without this interchange income we would not be able to offer free checking or rewards checking to our members. We would have to make up for this income in other ways such as reducing deposit rates and/or increasing loan rates, both of which hurt our members. I also don't think the merchants will hire additional people or reduce their rates if these changes take effect. I think they will just absorb the profit. I sincerely hope that the Federal Reserve Board does not change the current structure. As a credit union I feel it's our duty to protect our members along with the safety and soundness of our credit union.