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Subject: Reg I I - 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:

Establishing a minimum interchange without also regulating the costs incurred by financial institutions for processing of same transactions does not make sense. This proposal has the ability to negatively impact use of one of the most convenient and fastest growing methods of payment available today. This payment type has worked and been accepted because Financial Institutions have been willing to take the payment risk allowing all merchants to accept these payments without use of stringent customer identification processes or return of payment as dishonored. By implementing a ceiling on interchange that does not reflect the risk based on the dollar of the transaction is contrary to any standard business practice in place today. Let's not forget that financial institutions are for profit places of business.