

From: American Heritage Federal Credit Union, Paul Fox
Subject: Reg II - Debit card Interchange

Comments:

The Proposed Rule referenced above favors all merchants accepting debit card transactions enhancing their ability to make sales and unfairly reducing their costs for having this ability; instead it increases the expense burden to the credit union providing the payment capability through their members.

Credit unions focus on offering great value to consumers with higher rates on savings, lower rates on loans and low or no fees for services. The implementation of interchange will hit the pocketbooks of Americans holding debit cards. Credit unions may be forced to impose monthly checking account fees, institute fees or find other ways to cover the costs of providing debit cards, something credit unions avoid imposing. In short, every dollar that is spent complying with this regulation is a dollar that is not used to benefit the credit union's membership. Please overturn or reverse this injustice.

Thank you.

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