

From: Raelynn Radway  
Subject: Reg II - Debit card Interchange

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Comments:

Raelynn Radway

January 20, 2011

Federal Reserve Board  
Board of Governors of the Federal Reserve System  
20th Street and Constitution Avenue NW  
Washington, DC 20551

Dear Federal Reserve Board:

As a smaller credit union, we are very concerned with the Federal Reserve Board's recently proposed regulation that would regulate debit card interchange fees and routing. The cost of providing a debit card program for our members--with the ever increasing costs of fraud protection and fraud losses--would be prohibitive without the offset of interchange income. The Fed should implement reasonable interchange regulations that will allow small issuers to continue to be protected from lower interchange fees. Otherwise, consumers will have no choice but to get their debit cards from the big banks, as they will be the only institutions who can afford to provide the service. And, aren't those the very institutions this regulation intended to protect consumers from?

Sincerely,

Raelynn Radway