

From: April Black  
Subject: Reg II - Debit card Interchange

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Comments:

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Name: April Black

Affiliation:

Category of Affiliation:

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

I would like to express my concern over the reduction of interchange income rates to a cap of \$0.14. As a banker, this proposal does not take into consideration the impact it will have on the banking industry. Most financial institutions provide a "debit" card to customers at no expense and customers see this as a convenience as opposed to carrying cash/checks which means we absorb the cost of the card production. Additionally, we must write off several thousands of dollars each year due to fraud for which the customer is not responsible for. In order to prevent as much fraud as possible, we use a fraud monitoring system to review each transaction which is costly as well. If we are going to see a reduction in income to offset these expense, we will eventually be forced to pass these fees on to the consumer. So, in the long run, your attempt to "protect" the consumer will only come back around to cost them more than it was in the beginning!