

From: Galileo Processing, Inc., Christopher D. Trujillo
Subject: Reg I I - Debit card Interchange

Comments:

Dear Ms. Johnson,

Galileo Processing, Inc. is a third party processor of prepaid and credit cards for banks that issue such cards. We are members of the NBPCA and support the views shared by the the NBPCA pursuant to its comment letter dated February 17, 2011. We urge you to reconsider all of the points set forth in the NBPCA's comment letter related to the Durbin Amendment. The far reaching effects this legislation would have on consumers, banks and the electronic payments systems as we know it, would be disastrous. Consumers have come to take for granted the ease with which payments can be made via debit cards. There is a cost of running these networks. Prices for using these services should be controlled by market forces not governmental forced price controls.

While we agree with the comments of the NBPCA response in most areas, we do not agree with the NBPCA's request for a clarification related to the government and prepaid card exemption requirement to provide one free ATM withdrawal per month. The fee waiver should relate only to fees the issuer of the program charges. It should not include a waiver of the fees the ATM operator charges.

If the issuer does not control the ATM, and a customer decides to use his or her card at such ATM, the issuer has not control over the fees the ATM operator charges. Those fees should not be required to be credited by the issuer.

We thank you for considering our position.

Sincerely,

Christopher D. Trujillo
Galileo Processing, Inc.