

From: Jim Nagle  
Subject: Reg I I - Debit card Interchange

---

Comments:

February 23, 2011

Federal Reserve

Dear Federal Reserve:

It is not enough to only have a competitive choice on PIN transactions. Many transactions, such as those on the Internet, currently cannot be PIN transactions. The way that the dominant card networks exclude other networks from taking "signature" transactions is arbitrary and unfair. There are "signature" transactions with no signature and PIN transactions with no PIN entered. All of these are simply debit transactions - with the same card, at the same merchant, paying the same amount from the same bank account. Whichever network can do this the best and cheapest way should get that business.

Sincerely,

Jim Nagle