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Subject: Reg I I - Debit card Interchange

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Comments:

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Proposal: Regulation II - Debit Card Interchange Fees and Routing  
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Comments:

Implementing changes to routing and exclusivity must be done carefully as proposed "Alternative B" would place an undue burden on credit unions and likely negatively impact our members. "Alternative A" which requires two unaffiliated payment networks for all cards is preferable and while still burdensome, it would have the least detrimental impact.