



Member owned. Not-for-profit.

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February 17, 2011

Anne Grills  
Resource One Credit Union Compliance Officer

Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, N.W.  
Washington, D.C. 20551

Subject: Durbin Amendment (Interchange Rates)  
Docket No. R—1404 and RIN No. 7100 AD 63

Dear Chairman Bernanke:

My name is Anne Grills, the Compliance Officer with Resource One Credit Union. Resource One Credit Union has proudly served its members in our communities of Dallas and Northwest Harris Counties for 75 years. We serve roughly 38,000 members and have an asset size of \$310,000.00.

I would like to thank the Federal Reserve for allowing comments on the Interchange Rate rule. I would respectfully ask, however, that you consider postponing implementation of the rule. Once the rule is implemented, Resource One Credit Union would lose an estimated \$75,000.00 monthly in fee income. We currently offer free checking and quality, reasonably priced products. The ruling will likely cause us to eliminate the free checking. Therefore, the consumer ultimately is the one that will bear the brunt of the implementation. Additionally, our Credit Union would see an increase in fraud as the merchant would have no incentive to make the transaction safe and secure. Merchants have not been able to keep transactions secure in the past. They would be able to use several networks and choose which one he would use for the transaction.

Again, I want to thank the Federal Reserve for allowing me to comment on this rule. On behalf of Resource One Credit Union and our 38,000 member/owners, I would urge the Federal Reserve to postpone implementation of the Interchange Rate rule.

Respectfully,

A handwritten signature in cursive script that reads 'Anne Grills'.

Anne Grills  
Resource One Credit Union- Compliance Officer  
214.565.5369 Phone / 214.292.0705 Fax



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February 17, 2011

Jim Brisendine  
Resource One Credit Union- President/CEO

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

Re: Regulation E (Electronic Funds Transfer Act) as required under the Dodd Frank Act  
Docket No. R-1404 and RIN No. 7100 AD63

Dear Chairman Bernanke:

Originally chartered in Dallas, TX in 1936, Resource One Credit Union has been serving our community with over 40,000 members worldwide today. The purpose of this letter is to voice our opposition with the aforementioned proposal and respectfully request that implementation of any versions be postponed.

More time is needed to fully research exactly how this proposal will affect our members, consumers as a whole, merchants, and financial institutions like Resource One Credit Union. If merchants are able to choose an electronic payment network of their choice or if they are allowed to pressure consumers from using their credit union debit cards Resource One C.U. would be severely impacted.

The fee structure is such that we would lose an estimated \$75,000 monthly in fee income. With this added hit, we would inevitably have to turn over some or all of the cost to our members, which could result in us losing even more members and more income. Additionally, the fee cap does not take into consideration fraud prevention and the data security costs.

If something must be done now, I believe the "alternative A" is an acceptable routing method. Ultimately however, I would like to personally urge you to postpone implementation of this rule until further research has been completed. Thank you so much for considering the comments I've made, and should you have any additional questions please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Jim Brisendine'.

Jim Brisendine  
Resource One Credit Union-President/CEO