

Carol Ann Petren
Executive Vice President,
General Counsel and
Corporate Secretary



Routing TL17A
1601 Chestnut Street
Philadelphia, PA 19192

February 22, 2011

VIA E-MAIL

Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Ave., N.W.
Washington, DC 20551

Re: *Federal Register Notice on Debit Card Interchange Fees and Routing;
Proposed Rule (Docket No. R-1404 and RIN No. 7100 AD63)*

Dear Ms. Johnson:

On behalf of CIGNA Corporation (“CIGNA”), I am writing regarding the Federal Register notice recently published by the Board of Governors of the Federal Reserve System (“Board”), soliciting comments on proposed debit card interchange fees and routing rules. CIGNA appreciates the opportunity to comment on these issues.

CIGNA (NYSE: CI) is a global health services company that is dedicated to helping people improve their health, well-being and sense of security. CIGNA's operating subsidiaries provide an integrated suite of medical, dental, behavioral health, pharmacy and vision care benefits, as well as group, life, accident and disability insurance to more than 46 million people throughout the United States and around the world.

CIGNA supports the efforts to prohibit network exclusivity and to standardize interchange fees, thereby making them reasonable and proportional. As noted in the Federal Register notice, interchange fees for debit card transactions have increased significantly since the 1990s. The Board's current proposals to cap interchange fees would enable our organization to offer our customers and business partners a wider range of payment options.

However, CIGNA requests that the Board consider amending the proposed rules to further clarify that the rules' exemption of prepaid cards specifically includes prepaid cards used in connection with health and employee benefits programs (i.e. Health Savings Accounts - HSAs, Flexible Spending Accounts – FSAs and Health Reimbursement Accounts - HRAs). Such a clarification would be consistent with legislative history; Congressional leaders noted their intent for the prepaid card exemption to cover all health benefit accounts in floor statements.

America's Health Insurance Plans (AHIP) census data shows that there is a growing trend in people covered by HSAs. CIGNA has noted that use of our HRA and FSA plans are similarly increasing. The explicit exclusion of HSA, FSA and HRA prepaid cards from the Board's proposed debit card interchange fees and routing rules will ensure that CIGNA can continue to administer such programs at a reasonable cost to our customers.

* * *

Thank you for the opportunity to comment on these important issues.

Sincerely,

A handwritten signature in black ink that reads "Carol Ann Petren". The signature is written in a cursive style with a large initial "C" and "P".

Carol Ann Petren
Executive Vice President,
General Counsel and
Corporate Secretary
CIGNA Corporation