



Florida Parishes Bank

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February 14, 2011

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

Re: Docket No. R-1404 and RIN No. 7100 AD63

Dear Ms. Johnson:

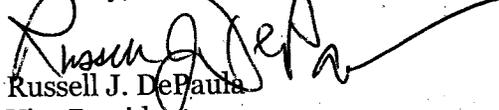
I am very concerned about proposed restrictions on debit card transaction fees. I fear this will adversely impact community banks. The two-tier fee system, in my view, is not practical. Competitive pressures from larger banks will take away any benefit that banks under \$10 billion might have seen. I don't think these reforms are meant to hurt community banks, but I believe this will be the outcome.

Revenues from gift cards have fallen sharply since the advent of those reforms. Our bank is seriously considering discontinuing the product. I don't think it serves the common good for financial services to become overly concentrated in the hands of a few mega-banks. Yet this legislation, and legislation like it, will certainly hasten the day when only the mega-banks can survive.

In the early days of debit cards, our bank charged customers \$.25 per transaction. Maybe we will have to go back to something like that. It won't be good for consumers, and it will make the payments system a lot less efficient. Do we really want to go back to paper checks?

Regarding routing requirements, I think alternative A is preferable.

Sincerely,


Russell J. DePaula
Vice President