

**February 8, 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**

Dear Ms. Johnson,

My name is Carol Sundberg, and I have been in the financial services industry for over 35 years. I am the Senior Vice President of eCommerce at Georgia's largest credit union, Delta Community Credit Union. I am writing to express my concern about the Federal Reserve Board's debit interchange regulations proposal. The impact of the proposed debit interchange and routing regulations is concerning to me both as a credit union member and a financial services professional.

I understand that due to our asset size, Delta Community may not be subject to the proposed interchange caps. However, we will be impacted by network routing provisions. There is a lack of clarity around how consumers will benefit from the proposed rules, and it is an issue that should be addressed.

Merchants have argued that a reduction in interchange expense for debit card sales will directly benefit consumers through reduced prices of goods and services. Depending on the size of the merchant, their processor/acquirer may charge one flat fee per transaction which is inclusive of both processing (interchange) and non-processing related charges.

After reviewing the proposed Debit Interchange and Routing Regulations, I'm deeply concerned about the lack of oversight directed to merchant processors and the merchants themselves to ensure any reduction in interchange expense they realize directly reduces the cost of goods and services for consumers. It is unfair for consumers if no guarantee of reduced goods and services pricing by merchants is included in the final language of the rules. I'm urging the Federal Reserve Board to ensure this guarantee is addressed in the final version of the Debit Interchange and Routing Regulation.

If you have additional questions, please contact me at 404-677-4741.

Regards,



Carol Sundberg  
SVP - eCommerce



EQUAL HOUSING LENDER

**NCUA**

This credit union is federally  
insured by the National Credit  
Union Administration.