

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

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

February 15, 2011

Board of Governors of the Federal Reserve System,

I appreciate the opportunity to comment on the Federal Reserve System's proposed "Debit Card Interchange Fees and Routing" rule.

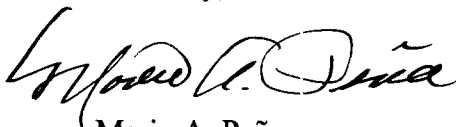
I would ask that we apply a simple test to this rule and see if helps in determining if this is the right course of action. If we can answer ALL four questions, in the affirmative, then by all means proceed, but if the answer is no to just one of the questions, then this rule should NOT be passed.

1. Is it the TRUTH? Based on the information available, I have to say that I am not sure. If I cannot be totally certain, then the answer has to be NO. But even if I were to give it the benefit of the doubt and answer in the affirmative, there are still three more questions to answer.
2. Is it FAIR to all concerned? It most certainly is not; otherwise I would not be writing this letter. This rule is going to impact me personally along with millions of other consumers who after having the benefits of multiple "FREE" products and services for many years, will now be faced with having to pay for them. And it's not just the fees; it will also impact the convenience of being able to carry out transactions from my computer, or my mobile phone. The answer is NO.
3. Will it build GOODWILL and BETTER FRIENDSHIPS? I just cannot see how this ruling can accomplish the above. I see it negatively affecting low to moderate income customers by making it more difficult to maintain a bank account and will have to turn to more expensive, less convenient, non-traditional banking services. Again, the answer is NO.

4. Will it be BENEFICIAL to ALL concerned? I fail to see how this will benefit me as a consumer, or the banks who will find themselves being perceived by the customers as the culprits for eliminating free products and services. The only beneficiaries of this harmful rule will be the retailers, who will take home an additional \$15 billion in profits and consumers will be left to deal with the consequences. This rule does not require that retailers pass along even one penny of their savings to customers. Meanwhile, banks, forced to lose money on debit interchange transactions, will be forced to compensate by increasing fees for deposit customers. The answer here is a resounding NO.

I'm sure by now you've recognized the above questions as belonging to The Four Way Test which is one of the hallmarks of Rotary International and is the cornerstone of all action of all the things we think, say and do. If you know of a better test, please let me know.

Sincerely,



Mario A. Peña