

Tennessee Bankers Association
Regulation II, Debit Interchange Fees and Routing (Docket No. R-1404)

On May 3, 2011, representatives of the Tennessee Bankers Association met with Governor Sarah Bloom Raskin to discuss the Board's proposed rulemaking on debit card interchange fees and routing. Representatives of the association expressed concerns about the potential lost revenue for banks, the ineffectiveness of the exemption for smaller banks, and whether a final rule would fully account for banks' fraud-prevention costs related to interchange. Representatives of the association also noted that the loss of earnings for banks under the proposal would be a gain for other business interests. Association representatives also asked whether additional time could be provided for further study of the rule's effects.