

Proposal: 1748 (AG15) Regulation II - Debit Card Interchange Fees and Routing

Description:

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Comment ID: 141047

From: Whit Sours

Proposal: 1748 (AG15) Regulation II - Debit Card Interchange Fees and Routing

Subject: R-1748; Regulation II - Debit Card Interchange Fees and Routing

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Comments:

Date: Aug 11, 2021

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Proposal: Debit Card Interchange Fees and Routing [R-1748]

Document ID: R-1748

Revision: 1

First name: Whit

Middle initial:

Last name: Sours

Affiliation (if any):

Affiliation Type: ()

Address line 1:

Address line 2:

City:

State:

Zip:

Country: UNITED STATES

Postal (if outside the U.S.):

Your comment: This proposal may make it harder for financial institutions to offer services to underbanked segments of the population. These institutions rely on income from interchange transactions in part to support their unauthorized transfer obligations under the EFTA/Regulation E. Faced with the loss of this income, institutions may decide they can no longer offer certain electronic transactions or they may limit the amounts of electronic transactions to customers fitting certain risk profiles due to previous loss activity.