

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

Description:

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Comment ID: 140818

From: Gabriel Porras`

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:

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

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Your comment: Dear Board of Governors of the Federal Reserve System Members, In response to your invitation to comment on Debit Card Interchange Fees and Routing, I am writing today requesting the following: immediate enforcement of the routing competition provisions; a reduction of the regulated debit rate Routing Competition Provisions The proposed clarification recognizes that often, only one debit network is enabled for card-not-present transactions. This is in direct conflict with the regulation that debit card issuers must enable, and allow merchants to choose from, at least two unaffiliated networks. I strongly support the Board moving forward with enforcing the debit routing provisions to ensure that merchant's routing rights are enforced regardless of how or where the transaction occurs and is authenticated. Regulated Debit Rates Finally, the time has come to re-evaluate the regulated rate. The rate has not been changed in ten years, and issuers have had plenty of time to reduce their costs. The regulated rate should be reduced to make it both reasonable and proportional to issuer costs. Speed is of essence ahead of the holiday season, so that merchants, and in turn consumers, can see relief during another record setting holiday shopping season for e-commerce. Thank you again for the opportunity to provide comments on the proposed clarifications, and I strongly encourage the Board to act quickly on both enforcing the routing law and reducing the regulated debit rate. Sincerely Yours, Gabriel Porras