



June 15, 2021

Ann E. Misback

Secretary

Board of Governors of the Federal Reserve System

Constitution Avenue NW & 20<sup>th</sup> Street NW

Washington, DC 20551

**RE: Docket No. R-1748 – Requesting a Swift finalization of the Clarification on Debit Card Interchange Fees and Routing**

Dear Ms. Misback,

The executive committee of the Merchants Payments Coalition: FMI-The Food Marketing Institute, National Association of Convenience Stores, National Grocers Association, and the National Retail Federation write today to express our appreciation for the opportunity to provide comment to the Board of Governors of the Federal Reserve System's notice of proposed rulemaking on Debit Card Interchange Fees and Routing and we look forward to providing fulsome, substantive comments. We also write today to urge an expeditious finalization of the clarification.

While we are grateful for the opportunity to provide comment, the Board of Governors is under no statutory obligation to request comment. The final rule promulgated in July 2011 clearly prohibits routing restrictions and network exclusivity on debit cards.

Regulation II is clear, but widespread failures to follow the law have continued for too long and at a high cost to U.S. merchants and their customers. Any financial institution not following the clarification as enumerated in the NPRM is in violation of the law.

It is imperative that the clarifications proposed by the Board in the NPRM be finalized as soon as possible for the good of U.S. consumers and merchants.

Sincerely,

FMI – The Food Marketing Institute  
Merchants Payments Coalition  
National Association of Convenience Stores  
National Grocers Association  
National Retail Federation