

Proposal: 1818(AG67) Debit Card Interchange Fees and Routing

Description:

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Comment ID: 158366

From: Kish Bank, Thomas Minichiello

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Comments:

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To whom it may concern.

I am writing to express my deep concern and opposition regarding the Federal Reserve's proposal to lower the debit interchange price cap in Regulation II. As an executive at Kish Bank, a regional community bank headquartered in central Pennsylvania I understand the importance of maintaining a balanced and fair financial ecosystem that benefits both consumers and businesses alike. While I acknowledge the need for regulatory measures to ensure transparency and competition within the financial industry, I strongly believe that a reduction in the debit interchange price cap may have unintended consequences that could negatively impact various stakeholders.

For over 123 years Kish Bank has been the recognized leader in providing financial, human, moral, and education support in the five 5 contiguous counties that we serve. As a \$1.5 billion dollar community bank we take great pride in our reputation dwarfing our asset size. Our 270 plus team members serve over 35,000 business and families, as well as supporting local charities and community organizations with our time and treasure.

A lower interchange fee cap will lead to a reduction in revenue for financial institutions, especially smaller community banks like Kish, who are shouldering the burden and expense of card fraud, not the retailers. This loss in interchange fees collected could very well limit the financial support for the critical agencies that rely on our generosity to support the neediest among us.

I urge you to consider a balanced approach that takes into account the interests of both consumers and financial institutions. Collaborative efforts between regulatory bodies, financial institutions, and consumer advocacy groups can lead to policies that promote fair competition, innovation, and the overall well-being of the financial industry.

Thank you for your attention to this matter. I trust that you will carefully consider the potential consequences of the proposed changes to the debit interchange price cap and work towards a solution that benefits all stakeholders.

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