



Ann. E. Misback
Secretary
Board of Governors of the Federal Reserve System
20th St. and Constitution Ave. NW
Washington, DC 20551

**Re: Docket No. R-1818, RIN 7100-AG-67
Notice of Proposed Rulemaking: Debit Card Interchange Fees and Routing**

Dear Ms. Misback:

My name is Tyler Myers and I am the owner of a family business doing business in Alaska, Washington, and Oregon. I employ over 800 people where I offer medical benefits, retirement benefits, sick pay, education tuition reimbursements and other benefits to my employees. Our business is running grocery stores, convenience stores and hardware stores.

We are a diversified company that is doing business in high sales volume industries, but all with very low margins. As a result our sales are high, but the profit we make on those sales is low. Over the years the amount of sales transaction paid for with credit cards has increased significantly. Over 90% of our transactions are paid for by customers who use a credit card.

As a result, our credit card fees are extraordinarily high. **In fact, the fees we pay to the credit card companies exceeds the amount of money on our bottom line. Yes, the credit card companies make more than I as a business owner.** Yet we take all the risk, provide the jobs, and provide the employee benefits. In 2023 we paid over \$2,000,000. in credit card transaction fees. Interchange fees, or swipe fees, are a significant challenge for our business.

I support the Federal Reserve Board taking action to reduce the maximum debit interchange fee for debit card issuers and to establish a regular process for updating the interchange fee limit every other year. However, the new proposed fee limits are still much too high. The limits should be made even lower when the Fed writes its final rule. I also support the Fed's proposal to begin updating the debit swipe fee limits every other year, especially since the limits have not been touched since they were put into place 12 years ago.

The proposal to reduce the fees to cover fraud losses should also be adjusted. The Fed's own data shows that merchants now pay for more fraud losses than issuers pay. That is a major shift since the Fed finalized its rule. So, there should not be any fees charged to merchants to cover issuer's fraud losses. If there is to be any reimbursement to cover fraud losses, it should be paid by issuers to merchants – not the other way around.

As food inflation causes consumers to struggle to make ends meet these days, reducing credit and debit fees will allow me to lower my prices. This is the single best way to help offset consumers food costs.

Thank you for taking the time to read and understand my comments.

A handwritten signature in black ink, consisting of a stylized 'T' followed by 'Myers'.

Tyler Myers

President

The Myers Group

tyler@myersgroupllc.com