

**From:** TAlter@usafcu.org on 05/28/2004 10:51:14 AM  
**Subject:** Comment Call: Debit Card Fee Disclosures Study - R-1195 - Not op-1195 comment :should go in R-1196

Thank you for the opportunity to comment on the study that the Federal Reserve Board will conduct on debit card fees. On behalf of USA Federal Credit Union, I wish to express our belief that current disclosure requirements are sufficient to keep consumers informed of these fees.

If modifications are to be made to current requirements, we believe that the best place to enhance disclosure would be on the member's periodic statement. Currently, aggregation of all fees is allowed. The clearest disclosure to the consumer would be to list the fees either separately with each transaction or as a total identified for that specific fee on the statement. The potential additional requirement of reflecting the source and recipient of fees would likely be very costly to implement while providing, in our opinion, little additional value to the consumer.

We also urge the Board to avoid disclosure requirements at the point-of-sale. This would limit financial institution ability to assess fees in ways that are advantageous to the consumer. For example, if a financial institution wished to provide a certain number of free POS debits per month, the programming requirements to implement this service in compliance with POS disclosure requirements could be cost prohibitive.

While USA Federal Credit Union does not currently assess fees for POS-based debit card transactions, we encourage the board to continue current disclosure requirements and to avoid adding new requirements that would result in costly programming, little additional value to consumers and the potential for a reduction of the availability of this convenient and cost-effective service.

Tom Alter  
Executive Vice President  
USA Federal Credit Union  
2100 Executive Hills Blvd  
Auburn Hills, MI 48326  
(248)322-9800 X1018