

J. Norberto Romero III

February 15, 2011

Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW.
Washington, DC 20551.

Re: Docket No. R-1404 and RIN No. 7100 AD63

Board of Governors of the Federal Reserve System,

Thank you for the opportunity to comment on the Federal Reserve System's proposed "Debit Card Interchange Fees and Routing" rule.

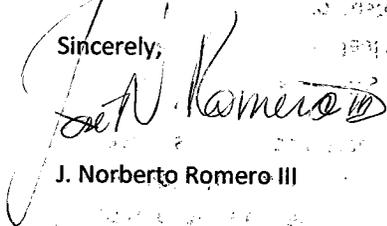
I am a bank employee who is concerned about the economic consequences of this new rule. My company might be forced to eliminate many of our free services, such as free checking, or charge accounts for debit cards, so that we will be able to compensate for the lost revenue from reduced interchange fees. The consumer will be tremendously affected instead of being protected.

The only beneficiaries of this harmful rule are retailers who will take home an additional \$15 billion in profits. Consumers will be left to deal with the consequences. The rule does not require that retailers pass along even one penny of their savings to customers. Meanwhile, banks, forced to lose money on debit interchange transactions, will be forced to compensate by increasing fees for deposit customers.

In a sense, this proposed rule is government imposed price control and will directly affect my bank's ability to fund operational costs for programs such as Free Checking and Mobile Banking. This action is a direct attack on consumer use since the debit card has become a fundamental part of buying products and services. Banks will lose significant income virtually making the debit card program unprofitable. This will result in elimination of debit cards by some banks, a charge directly to the consumer per transaction, a monthly fee, and at most, both. As a consumer on a restricted budget, I don't think it is right that I am charged for a debit card especially since it has always been a free service offered by my bank. If banks do not transfer part of the fees to our customers, these price controls will lead to inefficiencies in the payment system and will stifle innovation and improvements yet to come.

Lastly, we must keep in mind America's economy was established on the principals of innovation and entrepreneurialship. Rules such as these are a direct attack on our freedom to "Think Big". These attacks will have severe consequences with the upcoming generation making them think twice before looking for other avenues to improve our way of life.

Sincerely,



J. Norberto Romero III