

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

Description:

Comment ID: 159404

From: Bryna Butler

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Comments:

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Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551

I'm writing to ask that the Federal Reserve NOT propose any changes to Regulation II. Unfortunately, and inconsistent with the Administration's stated position on fees, the predictable result of the merchants' demands will be higher fees paid by consumers. Regulation II has been costly for banks of all sizes and cuts to the core of our ability to offer affordable checking account products, especially when consumers expect many services for free that cost banks money to run and maintain such as internet banking, bill pay, interactive budgeting tools, credit monitoring, mobile deposit, and more, much less the traditional services as phone and in-person assistance, night deposit, and costly ATMs.

I urge the Federal Reserve to recognize that it does not possess accurate data about the real-world experience of debit card issuers in the post-CNP rule world. Any efforts undertaken now to change Regulation II will be based on nothing more than guesses about key factors. For that reason, the Federal Reserve should postpone its October 25, 2023 agenda item on Regulation II and instead undertake research, informed by industry expertise.

Sincerely,

Bryna Butler